

Reporting of Accidents

The timely reporting of accidents is critical to the successful management of the accident event and subsequent issues that may follow, including the potential litigation of the event. It is imperative that all drivers follow the sequence below in all accident cases:

1. If possible, move your unit from the traffic lanes if it is impeding the progress of other traffic or if state laws require accident vehicles to be moved immediately.
2. Assist any injured parties to the best of your ability. This may include calling for emergency medical assistance.
3. Place your safety markers (triangles) at the appropriate locations in relation to your truck and turn on your emergency flashers.
4. Take photographs of the accident scene as soon as possible. Many times, when law enforcement officials arrive, they will not allow you to take photos, so it is important to accomplish this as soon as possible. **NEVER** take photos of injured or deceased victims.
5. Call the safety department and report the accident.
6. Begin your accident report, including the gathering of witness contact information.
7. Cooperate fully with law enforcement officials. However, **DO NOT** offer any statements of guilt or opinion as to the cause of the accident. Simply state the facts of the accident as accurately as you recall them.
8. When you have completed the immediate needs at the scene of the accident, call your dispatcher again to let them know you are ready to continue on your way. If directed to report for a post-accident drug and alcohol screen, follow those directions immediately as there are specific time limits on these tests in order to be compliant with Federal Motor Carrier Safety Regulations.

Failure to follow these procedures, particularly those regarding the taking of photographs and cooperating with law enforcement officials, will result in discipline up to and including discharge or termination of lease agreement.

R L C Oilfield Services, LLC

Emergency Phone Directory

Name	Number	Position
Charlie Dupuy	225-938-3349	Safety Director
Barbara Rocha	225-485-2454	Compliance Director
Dorene Hebert	318-451-4987	Dispatcher
Becky Miller	225-328-2065	Dispatcher

Commercial Motor Vehicle Accident Report

ACCIDENT DATE	DAY OF WEEK M T W T H F S S N	TIME OF DAY AM PM	TYPE OF ACCIDENT <input type="checkbox"/> TW <input type="checkbox"/> M <input type="checkbox"/> F <input type="checkbox"/> S <input type="checkbox"/> P	Of ACCIDENT (he- involved) or more of the following: (mark all apply) <input type="checkbox"/> - Vehicle <input type="checkbox"/> - Train <input type="checkbox"/> - Pedestrian <input type="checkbox"/> - Other	DRIVER'S NAME (LAST, FIRST, MIDDLE)	DRIVER'S LICENSE NUMBER	STATE	DATE OF BIRTH	SEX
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YOUR VEHICLE (No. 1)									
DRIVER'S NAME (LAST, FIRST, MIDDLE)			DRIVER'S LICENSE NUMBER		STATE	DATE OF BIRTH		SEX	
RIVER'S ADDRESS			CITY		STATE	ZIP CODE			

OTHER VEHICLE (No. 2)									
DRIVER'S NAME (LAST, FIRST, MIDDLE)			DRIVER'S LICENSE NUMBER		STATE	DATE OF BIRTH		SEX	
RIVER'S ADDRESS			CITY		STATE	ZIP CODE			

INSURANCE COMPANY NAME (NOT AGAM AWADORS)										
POLICY NUMBER			C1. E1. De. TIFICATION NUMBER		STATE		ZIP CODE			

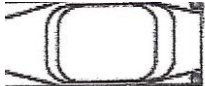
IF APPLICABLE, VEHICLES WERE INVOLVED IN THE ACCIDENT. ATTACH AN ADDITIONAL SHEET									
DESCRIBE WHAT HAPPENED:									

I certify that the information given on this report is true and correct to the best of my knowledge.									
SIGNATURE OF MAKING REPORT					NAME OF PERSON MAKING REPORT				

COMPLETE THE OTHER SIDE OF THIS FORM

WEATHER CONDITIONS	ROAD SURFACE	LIGHT CONDITIONS
<input type="checkbox"/> Clear <input type="checkbox"/> Raining: <input type="checkbox"/> Snowing <input type="checkbox"/> Fog <input type="checkbox"/> Other	<input type="checkbox"/> Dry <input type="checkbox"/> Wet <input type="checkbox"/> Snowy <input type="checkbox"/> Icy <input type="checkbox"/> Other	<input type="checkbox"/> Daylight <input type="checkbox"/> Dawn or Dusk <input type="checkbox"/> Darkness (tighted) <input type="checkbox"/> Darkness (Unlit) <input type="checkbox"/> Other

YOU WERE HEADED	OTHER DRIVER WAS HEADED
<input type="checkbox"/> North <input type="checkbox"/> South <input type="checkbox"/> East <input type="checkbox"/> West On: _____ (name of street, road, or route)	<input type="checkbox"/> North <input type="checkbox"/> South <input type="checkbox"/> East <input type="checkbox"/> West On: _____ (name of street, road, or route)

Vehicle Damage	Diagram
 <p>USE: ARROW TO SHOW FIRST IMPACT (SHADE DAMAGE TO AREA)</p> <p> <input type="checkbox"/> Vehicle towed <input type="checkbox"/> Rollover <input type="checkbox"/> Under-car <input type="checkbox"/> Totaled <input type="checkbox"/> Unknown </p>	<p>Number each vehicle: _____</p> <p>Show pedestrian/t, bicyclist by: _____</p> <p>Show railroad tracks by: _____</p> <p> (name of street, road or route) </p>

Defensive Driving Expectations

R L C Oilfield Services, LLC embraces the concept of defensive driving and expects that all drivers and contractors use the proven strategies of defensive driving in order to maintain a safe and accident-free operation. All drivers and contractors are expected to follow the rules of defensive driving as set forth below:

- 1. Possess the knowledge of and strictly observe all traffic rules and regulations for the area in which the vehicle is being operated.**
- 2. Maintain a constant alertness for illegal or unsafe acts and driving errors of other drivers. Be willing to make timely adjustments in your own driving in order to avoid being involved in an accident resulting from such acts.**
- 3. Be aware of and prepared to make intelligent adjustments due to the potential of special hazards presented by abnormal, unusual or changing conditions in the mechanical functions of your vehicle, type of road surface, weather, degree of light, flow of traffic and your own physical condition and state of mind.**
- 4. Possess a thorough knowledge of the rules of right-of-way and a willingness to yield right-of-way to the other driver whenever is may prevent an unsafe condition or accident.**
- S. Maintain an attitude of confidence in your ability to safely operate your vehicle in a manner that consistently avoids being involved in any preventable accident.**

I have read and understand the safe driving expectations that RLC Oilfield Services, LLC holds upon it's truck drivers and I am committed to meeting those expectations.

Driver's signature

Date

DOT Forms & Policies
Definitions and Instructions for Use

Driver Qualification File Documents

Driver's File Checksheet – This form assists in the process of keeping driver qualification files current.

Driver Application For Employment– This application is specifically designed for use when hiring someone who will be either occasionally or continually assigned to tasks that require the operation of commercial motor vehicles.

Request for Information from Previous Employers – This form is designed to document the mandatory process of attempting to gather information from the previous employers as listed on the newly hired driver's application. It must be sent to each of the DOT regulated previous employers for whom the newly hired driver worked in the 36 months immediately previous to the time you hired him/her. It is imperative that you show a good faith effort to attempt to gather this information within 30 days of the first date of assignment to any safety-sensitive duty (loading, unloading, servicing, inspecting, or driving a truck).

The best process is as follows:

1. Make phone contact with the applicable previous employers to find out to whom you should send the inquiry and what method they would best respond to (fax or scanned/emailed), as well as, the proper contact party.
2. Complete the top portion of page one, indicate **First Request** with a checkmark, and indicate the driver's name and Social Security Number in the beginning of the second section.
3. Transmit the inquiry to each applicable previous employer (this should be done as quickly as possible – at least within the first three days after hire date is always best).
4. Print some form of evidence of your transmission:
 - a. A fax confirmation/transmittal report if faxed.
 - b. A copy of your email to which the scanned request was attached.
5. If the previous employer has not responded within 10 calendar days, check the **Second Request** box on the form and re-transmit, again printing some form of evidence of the transmission (fax report or printed email).

Once you have made two well-documented efforts to attempt to gather the information, it is generally accepted that you have met the requirements for what would be considered a good-faith effort.

Request for Check of Driver's License – This document, though not mandatory, may be necessary in order to acquire the mandatory pre-employment and/or annual Motor Vehicle Records (MVR). The form, when signed by the driver, gives reporting agencies permission to provide you with the MVR record directly.

Motor Vehicle Driver's Certification of Violations / Annual Review of Driving Record – This is a two-in-one form that accomplishes two interrelated annual requirements. The top half of the form is a certification of violations that is to be completed by your drivers on an annual basis. They should be advised that there will be a comparison of the information that they provide on this form to the information found on the annual MVR you acquire. The second half of the form is an employer's certification that the MVR, as well as, the driver's safety performance record for the past year has been

reviewed and that the driver either (1) meets the minimum requirements for safe driving, (2) does not meet the minimum requirements for safe driving, or (3) is disqualified under the provisions of 49CFR Part 391.15.

The best process for managing this requirement each year is as follows:

1. Run MVRs on all drivers in one batch (perhaps in connection with the annual renewal of your liability insurance policy – helps maintain consistency in when you do this each year).
2. After acquiring and reviewing the MVRs on all drivers, give each driver a copy of the **Motor Vehicle Driver's Certification of Violations / Annual Review of Driving Record** form and ask them to complete the top half (Certification of Violations) and return to you within three days.
3. Once you receive the **Motor Vehicle Driver's Certification of Violations / Annual Review of Driving Record** back from the driver, then complete the bottom half of the form (Annual Review of Driving Record), check the appropriate statement box, sign and date the form, and place in the driver's qualification file. This form should be retained for three years.

Record of Road Test – This form is necessary when hiring a non-CDL licensed driver who will be operating vehicles that do not require a CDL (those with a manufacturer's GVWR of less than 26,001#), or when hiring any driver who will be pulling tankers, doubles or triples. The road test should be a part of the selection and hiring process and should be conducted by either an experienced member of your safety team or one of your best CDL licensed drivers who has several years of accident-free driving experience.

Release & Documentation of Pre-Employment Testing – This is also not a mandatory form, but one that assists in providing proof that you have made every effort to gather information regarding previous pre-employment drug and/or alcohol testing on the new driver that you are hiring.

Pre-Employment Urinalysis & Breath Analysis Consent Form – Though not mandatory, this form can be used to provide evidence that you have advised your new hire drivers that they are subject to the mandatory DOT drug and alcohol testing regulations and that they have acknowledged their consent to such testing.

Driver's Statement of On-Duty Hours – This form is designed to document the number of hours that a newly-hired driver worked in the seven days immediately previous to the date you hired him/her. Though the form itself is not mandatory, it is mandatory that you be aware of the number of hours the driver has available under the Hours of Service rules on the first date of assignment to safety-sensitive duties. By completing this form, you will be able to see if they have enough hours available on their first day of employment with your company. Generally speaking, you should be concerned only if they indicate that they have worked in excess of 50 hours in the previous seven days. If they indicate that they have been off-duty for any period of 34 or more consecutive hours during those seven days, you need only count the hours forward from that point to calculate their total hours worked.

DOT Policies

Defensive Driving Expectations – This policy provides evidence that you have set safe driving expectations for your CMV drivers and are committed to their safe operations of your fleet vehicles. Each

driver should be given a copy of this policy to sign and a copy of the signed policy should be kept in their personnel file.

Vehicle Inspection & Maintenance Policy – This policy provides evidence that you have designated the responsibilities of daily vehicle inspections, periodic vehicle inspections, and both scheduled and non-scheduled maintenance of your fleet vehicles. It defines who is responsible for each of these areas.

DOT Drug & Alcohol Testing Policy – This is a mandatory policy that covers all of the aspects of DOT drug and alcohol testing – who can be tested, under what circumstances, how they will be tested, the consequences of positive tests, the consequences of refusals to test, who the Designated Employer Representative is, contact information on the Medical Review Officer (MRO), etc. A copy of the policy must be given to each CDL licensed driver. Have them sign the policy acknowledgement page at the back and place that page in their personnel file. They should be given the remainder of the policy to keep.

Minimum Acceptable Qualifications for Driving Positions – This policy establish evidence that you have some minimum threshold for the qualifications of a person who will be hired into a driving position.

Miscellaneous Forms

DOT Recordable Accident Register – The accident register is a mandatory document that must be completed on an annual basis. Each DOT recordable accident incurred must be included on this form in the year that it occurs. An accident is considered to be DOT recordable if it meets any of the following criteria:

1. If the accident results in a fatality.
2. If the accident results in any party who is involved requiring immediate medical treatment away from the scene of the accident.
3. If any of the vehicles in the accident require towing from the scene as a result of disabling damage resulting from the accident.

Observed Behavior: Reasonable Suspicion Record – This form should be utilized to record the specific circumstances / observations leading to the drug and/or alcohol testing of any driver under the reasonable suspicion provisions of the DOT drug and alcohol testing regulations. It is important to remember that the only person who can call for a reasonable suspicion drug of alcohol test is someone who has been trained in the recognition of drug and alcohol abuse symptoms. This is accomplished through the mandatory Reasonable Suspicion Training for Supervisors.

R L C OILFIELD SERVICES, LLC

Driver Training Certifications

1. Employee Record of Training Certification	y	N
2. CSA Training		
a. Overview Film Certification	y	N
b. Pre-trip Inspection Training	y	N
c. Company DVIR Policy (Signed)	y	N
d. Company Inspection and Maintenance Policy (signed)	y	N
e. Company Inspection Discipline Policy	y	N
3. Defensive Driving		
a. Defensive Driving (film) Certificate	y	N
b. Company Defensive Driving Policy (signed)	y	N
c. Company Accident Reporting Policy (signed)	y	N
d. Example Accident Report and Camera Kit	y	N
e. Company Emergency Numbers	y	N
4. Hours of Service		
a. Hours of Service (film) Certificate	y	N
b. Company HOS Progressive Discipline Policy (signed)	y	N
5. CFR Hazardous Materials Training		
a. HM Communications Rules (film) Certificate	y	N
b. HM Driving and Parking Rules (film) Certificate	y	N
c. HM Loading and Placarding (film) Certificate	y	N
d. HM Security Awareness (film) Certificate	y	N
1. RLC Security Plan (signed)	y	N
e. Function Specific Training/ Proper PPE	y	N
1. Copy of FCT Training and Test	y	N
f. RLC Emergency Response Plan (give copy)	y	N
6. RLC Drug Policy and Program (give copy)		
7. Vehicle Inspection and Maintenance Policy	y	N
8. Discipline Policy Vehicle Inspections (CSA)	y	N
9. Emergency Response Plan	y	N
10. HM Security Plan (give plan)	y	N
11. Road Test (Signed !!)		

R L C OILFIELD SERVICES, LLC
Bossier City, LA.

EMPLOYEE RECORD OF TRAINING & CERTIFICATION

Driver Name: Last First Middle	Employer: R L C Oilfield Services, LLC
Driver Number:	Terminal Location:
Hire Date:	Status: <div style="display: flex; justify-content: space-around;">I Company driverD Owner/Operator</div>

AGENCY	Training Date	Description of Training	Trainer	Test Date	Score (if tested)	Recurrent
DOT		HM General Awareness				Orientation 3 year
DOT		HM Function-Specific				Orientation 3 year
DOT		HM Safety Training				Orientation 3 year
DOT		HM Security Awareness				Orientation 3 year
DOT		HM In-depth Security				Orientation 3 year
DOT		Shipping Papers				Orientation 3 year
DOT		HM Parking Requirements				Orientation 3 year
DOT		HazMat Table				Orientation 3 year
DOT		Hazard Classification				Orientation 3 year
DOT		HazMat Regulations Review				3 year
DOT		Emergency Response Guide (ERG)				Orientation Annual
DOT		HM Incident Reporting				Orientation Annual
DOT		Hours of Service				Quarterly
DOT		Substance Abuse				Orientation
DOT		Railroad Crossing Safety				Orientation

Training requirements in §172.704 and 177.816 cover six areas of training for Hazmat employees. Based on the training required for the above named Hazmat employee, provide the training and testing for compliance. Satisfy the recordkeeping requirements in 174.704(d) by completing the information contained herein. Materials used for this training are available for inspection upon request at R L C Oilfield Services, LLC Corporate Offices, Safety Department.

**R L C Oilfield
Services, LLC**

**ALCOHOL AND
DRUG TESTING POLICY,**

Prepared by: Greg C. Gossler, LLC

Effective Date: December 1, 2018

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COMPANY PHILOSOPHY

Drivers are an extremely valuable resource for R L C Oilfield Services, LLC business. Their health and safety is a serious concern. Alcohol or drug use may pose a serious threat to driver health and safety. Therefore, it is the policy of R L C Trucking, LLC to prevent substance use or abuse from having an adverse effect on our drivers. R L C Oilfield Services, LLC maintains that the work environment is safer and more productive without the presence of alcohol and illegal or inappropriate drugs in the body, or on company property. Furthermore, employees have a right to work in an alcohol and drug-free environment, and to work with employees free from the effects of alcohol and drugs. Individuals who abuse alcohol or use drugs are a danger to themselves, their coworkers, and R L C Trucking, LLC assets.

The adverse impact of substance abuse by drivers has been recognized by the federal government. The Federal Motor Carrier Safety Administration (FMCSA) has issued regulations which require the company to implement a controlled substance testing program. The company will comply with these regulations and is committed to maintaining a drug-free workplace. All drivers are advised that remaining drug-free and medically qualified to drive are conditions of continued employment with R L C Trucking, LLC.

Specifically, it is the policy of R L C Oilfield Services, LLC that the use, sale, purchase, transfer, possession or presence in one's system of any controlled substance (except medically prescribed drugs) by any driver while on company premises, engaged in company business, while operating company equipment, or while under the authority of R L C Oilfield Services, LLC is strictly prohibited. The FMCSA states that mandatory testing must apply to every person who operates a commercial motor vehicle (CMV) in interstate or intrastate commerce and is subject to the commercial driver's license (CDL) requirements.

The execution and enforcement of this policy will follow set procedures to screen body fluids (urinalysis), conduct breath testing, and/or search all driver applicants for alcohol and drug use. Those drivers suspected of violating this policy who are involved in a U.S. Department of Transportation (DOT) reportable accident, or who are periodically or randomly selected pursuant to these procedures. These procedures are designed not only to detect violations of this policy, but to ensure fairness to each driver. Every effort will be made to maintain the dignity of drivers or driver applicants involved; however, disciplinary action will be taken as necessary.

Neither this policy nor any of its terms are intended to create a contract of employment or to contain the terms of any contract of employment. The company retains the sole right to change, amend, or modify any term or provision of this policy without notice. This policy is effective July 8, 2016 and will supersede all prior policies and statements relating to alcohol or drugs.

The purpose of this policy is to set forth the procedures for the implementation of controlled substances and alcohol use and testing of driver applicants and current drivers pursuant to this Alcohol and Drug Testing Policy. These procedures are intended as a guide only, and are in no way intended to alter any existing relationship between R LC Trucking, LLC and any driver.

REGULATORY REQUIREMENTS

FEDERAL REGULATION - Part 382 of the Federal Motor Carrier Safety Regulations (FMCSR) requires the company to test all drivers of CMVs that require a CDL for alcohol and drugs.

NON-REGULATORY REQUIREMENTS

COMPANY POLICY - While the FMCSR set the minimum requirements for testing, the company's policy in certain instances may be more stringent. This policy will clearly define what is mandated by the FMCSR and what company procedure is.

WHO IS RESPONSIBLE

- A. COMPANY - The Company is responsible for providing testing for the driver that is in compliance with all federal and state regulations and laws, and within the provisions of this policy. The company will retain records related to testing and the testing process in a secure and confidential manner.

R LC Trucking, LLC alcohol and drug program administrator designated to monitor, facilitate, and answer questions pertaining to these procedures is:

NAME:	Ricky L. Cleveland
TITLE:	Operations Manager
LOCATION:	Corporate Office Bossier City, LA
TELEPHONE NUMBER:	318-664-3782

- B. DRIVER - The driver is responsible for complying with the requirements set forth in this policy. The driver will not use or abuse any controlled substance, or use alcohol when preparing to perform a "safety-sensitive function", while performing, or immediately after performing that function.
- C. SITE MANAGERS - All Site Managers will be aware of the driver's condition at all times the driver is in service of the company. The Site Manager shall be able to make reasonable suspicion observations to determine if the driver is impaired in some way, and be prepared to implement the requirements of this policy if necessary.

DEFINITIONS

When interpreting or implementing these procedures, or the procedures required by the FMCSA controlled substance testing regulations, the following definitions apply:

"Alcohol" means the intoxicating agent in beverage alcohol, ethyl alcohol, or other low molecular weight alcohols including methyl and isopropyl alcohol.

"Alcohol concentration (or content)" means the alcohol in a volume of breath expressed in terms of grams of alcohol per 210 liters of breath as indicated by an evidential breath test.

"Alcohol use" means the consumption of any beverage, mixture, or preparation, including any medication containing alcohol which, when consumed, causes an alcohol concentration in excess of those prescribed by Part 382 Subpart B (FMCSR).

"Breath Alcohol Technician (BAT)" is an individual who instructs and assists individuals in the alcohol testing process and operates the evidential breath testing device (EBT).

"CFR" stands for the Code of Federal Regulations.

"Collection site" means a place where individuals present themselves for the purpose of providing breath, body fluid, or tissue samples to be analyzed for specified controlled substances. The site must possess all necessary personnel, materials, equipment, facilities, and supervision to provide for the collection, security, temporary storage, and transportation or shipment of the samples to a laboratory.

"Commercial motor vehicle (CMV)" means a motor vehicle or combination of motor vehicles used in commerce to transport passengers or property if the motor vehicle:

1. Has a gross combination weight rating (GCWR) of 26,001 or more pounds inclusive of a towed unit with a gross vehicle weight rating (GVWR) of more than 10,000 pounds; or
2. Has a GVWR of 26,001 or more pounds; or
3. Is designed to transport 16 or more passengers, including the driver; or
4. Is of any size and is used in the transportation of materials found to be hazardous for the purposes of the Hazardous Materials Transportation Act and which require the motor vehicle to be placard under the Hazardous Materials Regulations (HMR) found in 49 CFR Part 172, Subpart F.

"Controlled substances" has the meaning assigned by 21 U.S.C. 802 and includes all substances listed on Schedules I through V as they may be revised from time to time (21 CFR 1308). In accordance with FMCSA rules, urinalysis will be conducted to detect the presence of the following substances:

- Marijuana;
- Cocaine;
- Opiates;
- Amphetamines; and
- Phencyclidine (PCP)

Detection levels requiring a determination of a positive result shall be in accordance with the guidelines adopted by the FMCSA in accordance with the requirements established by 49 CFR §40.29(e)(f).

"Driver" means any person who operates a CMV. This includes but is not limited to: full time, regularly employed drivers; casual, intermittent, or occasional drivers; and leased drivers and independent owner-operator contractors who are either directly employed by or under lease to an employer, or who operate a CMV at the direction of or with the consent of an employer. For the purposes of pre-employment/pre-duty testing only, the term "driver" includes a person applying to an employer to drive a CMV.

"Drug" means any substance (other than alcohol) that is a controlled substance as defined in 49 CFR Part 40.

"Evidential Breath Testing Device (EBT)" is a device approved by the National Highway Traffic Safety Administration (NHTSA) for evidential testing of breath, placed on NHTSA's "Conforming Products List of Evidential Breath Measurements Devices (CPL), and identified on the CPL as conforming with the model specifications available from the NHTSA Office of Alcohol and State Programs.

"FMCSA" means the Federal Motor Carrier Safety Administration, U.S. Department of Transportation.

"Medical review officer (MRO)" means a licensed MD or DO with knowledge of drug abuse disorders that is employed or used by a motor carrier to conduct drug testing.

"On duty time" means all time from the time a driver begins to work or is required to be in readiness to work until the time he/she is relieved from work and all responsibility for performing work. On duty time shall include:

1. All time at a carrier or shipper plant, terminal, or facility, or other property, or on any public property, waiting to be dispatched, unless the driver has been relieved from duty by the motor carrier;
2. All time inspecting, servicing, or conditioning any CMV at any time;
3. All driving time;
4. All time, other than driving time, in or upon any CMV except time spent resting in a sleeper berth;
5. All time loading or unloading a vehicle; supervising, or assisting in the loading or unloading; attending a vehicle being loaded or unloaded; remaining in readiness to operate the vehicle; and giving or receiving receipts for shipments loaded or unloaded; and
6. All time repairing, obtaining assistance, or remaining in attendance upon a disabled vehicle.

"Performing (a safety-sensitive function)" means a driver is considered to be performing a safety-sensitive function during any period in which he or she is actually performing, ready to perform, or immediately available to perform any safety-sensitive functions.

"Prescription medications" are legally prescribed medications issued by a licensed health care professional familiar with the driver's work-related responsibilities. Drivers must report such use to their immediate Site Manager or dispatcher, and may be required to present written evidence from the health care professional which describes the effects such medications may have on the driver's ability to perform his/her tasks. In the sole discretion of the alcohol and drug program administrator, a driver may be temporarily removed, with pay, from a safety-sensitive position, if deemed appropriate.

"Random selection process" means that alcohol and drug tests are unannounced; that every driver of a motor carrier subject to testing has an equal chance of being tested; and tests conducted annually shall equal or exceed ten (10%) for alcohol tests and twenty five percent (25%) for drug tests of the total number of drivers subject to testing for a motor carrier.

"Reasonable cause" means that the motor carrier believes the actions, appearance, and/or conduct of a CMV driver who is "on duty" as defined below, is indicative of the use of a controlled substance.

"Refusal to submit" means that a driver:

1. Failed to appear for any test (except a pre-employment test) within a reasonable time, as determined by the employer, consistent with applicable DOT agency regulations, after being directed to do so by the employer. This includes the failure of an employee (including an owner-operator) to appear for a test when called by a C/TPA;
2. Failed to remain at the testing site until the testing process is complete. If an employee leaves the testing site before the testing process commences, the employee is not deemed to have refused the pre-employment test;
3. Failed to provide a urine specimen for any drug test required by this part or DOT agency regulations. If an employee does not provide a urine specimen because he or she has left the testing site before the testing process commences, the employee is not deemed to have refused the pre-employment test;
4. In the case of a directly observed or monitored collection in a drug test, failed to permit the observation or monitoring of the driver's provision of a specimen;
5. Failed to provide a sufficient amount of urine when directed, and it has been determined, through a required medical evaluation, that there was no adequate medical explanation for the failure;
6. Failed or declined to take a second test the employer or collector has directed the driver to take;
7. Failed to undergo a medical examination or evaluation, as directed by the MRO as part of the verification process, or as directed by the DER. In the case of a pre-employment drug test, the employee is deemed to have refused to test on this basis only if the pre-employment test is conducted following a contingent offer of employment;
8. Failed to cooperate with any part of the testing process (e.g., refused to empty pockets when so directed by the collector, behaved in a confrontational way that disrupts the collection process); or
9. Is reported by the MRO as having a verified adulterated or substituted test result.

"Safety-sensitive function" means any of those on duty functions set forth in 49 CFR §395.2.

"Substance abuse professional (SAP)" means a licensed physician (MD or DO), or a licensed or certified psychologist, social worker, employee assistance professional, or addiction counselor (certified by the National Association of Alcoholism and Drug Abuse Counselors Certification Commission) with knowledge of and clinical experience in the diagnosis and treatment of alcohol and controlled substances-related disorders.

PROHIBITIONS

A. ALCOHOL PROHIBITIONS - The alcohol regulations prohibit any alcohol misuse that could affect performance of a safety-sensitive function, including:

1. Use while performing safety-sensitive functions;
2. Use during the four hours before performing safety-sensitive functions;
3. Reporting for duty or remaining on duty to perform safety-sensitive functions with an alcohol concentration of 0.04 or greater;
4. Possession of alcohol, unless the alcohol is manifested and transported as part of a shipment including the possession of medicines containing alcohol (prescription or over-the-counter), unless the packaging seal is unbroken;
5. Use during eight hours following an accident, or until he/she undergoes a post-accident test; and
6. Refusal to take a required test.

NOTE: A driver found to have an alcohol concentration of 0.02 or greater, but less than 0.04, shall not perform, nor be permitted to perform, safety-sensitive functions for at least 24 hours. Other consequences imposed by the regulations do not apply; however, documentation of this test constitutes written warning that company policy has been violated.

B. DRUG PROHIBITIONS - The regulations prohibit any drug use that could affect performance of safety-sensitive functions, including:

1. Use of any drug, except by doctor's prescription, and then only if the doctor has advised the driver that the drug will not adversely affect the driver's ability to safely operate the CMV;
2. Testing positive for drugs; and
3. Refusing to take a required test.

All drivers will inform the alcohol and drug program administrator of any therapeutic drug use prior to performing a safety-sensitive function.

TESTING CIRCUMSTANCES FOR APPLICANTS AND CURRENTLY EMPLOYED DRIVERS

A. PRE-EMPLOYMENT TESTING - All driver applicants/transferees will be required to submit to and pass a urine drug test as a condition of employment. Job applicants who are denied employment because of a positive test may reapply for employment after six months.

Offers of employment are made contingent upon passing the company's medical review, including the alcohol and drug test. Driver applicants who have received firm employment offers are to be cautioned against giving notice at their current place of employment, or incurring any costs associated with accepting employment with the company, until after medical clearance has been received. All newly hired drivers shall be on a probationary status for 30 days, contingent upon medical clearance for illicit controlled substance usage, as well as other conditions explained in the personnel policies. Under no circumstances may a driver perform a safety-sensitive function until a confirmed negative result is received.

Driver applicant drug testing shall follow the collection, chain-of-custody, and reporting procedures as set forth in 49 CFR Part 40.

- B. **EMPLOYEE DRIVERS** - Under all circumstances, when a driver is directed to provide either a breath test or urine sample in accordance with these procedures, he/she must immediately comply as instructed. Refusal will constitute a positive result. The driver will be immediately removed from the safety-sensitive function, and will be subject to further discipline or disqualification as appropriate.

1. Suspicion-Based Testing

- a. Reasonable Suspicion: If a driver is having work performance problems or displaying behavior that may be alcohol or drug-related, or is otherwise demonstrating conduct that may be in violation of this policy where immediate management action is necessary, a Site Manager or dispatcher, with the concurrence of the alcohol and drug program administrator, will require that driver to submit to a brief medical exam, breath test, and/or urinalysis. The following conditions are signs of possible alcohol or drug use (not all-inclusive):

- Abnormally dilated or constricted pupils;
- Glazed stare - redness of eyes (sclera);
- Flushed face;
- Change of speech (i.e., faster or slower);
- Constant sniffing;
- Increased absences;
- Redness under nose;
- Sudden weight loss;
- Needle marks;
- Change in personality (i.e., paranoia);
- Increased appetite for sweets;
- Forgetfulness, performance faltering, and poor concentration;
- Borrowing money from coworkers or seeking an advance of pay or other unusual display of need for money;
- Constant fatigue or hyperactivity;
- Smell of alcohol;
- Slurred speech;
- Difficulty walking;
- Excessive, unexplained absences;
- Dulled mental processes; and

- Slowed reaction rate.
- b. Site Managers must take action if they have reason to believe one or more of the above-listed conditions is indicated, and that the substance abuse is affecting a driver's job performance or behavior in any manner. A trained Site Manager observing such conditions will take the following actions immediately:
- Identify the employee involved, and keep under direct observation until the situation is resolved.
 - Secure the alcohol and drug program administrator's concurrence to observations; job performance and company policy violations must be specific.
 - After discussing the circumstances with the Site Manager, the alcohol and drug program administrator will arrange for the site manager to talk with the driver. If the site manager believes, after observing and talking to the driver, that the conduct or performance problem could be due to substance abuse, the driver will be immediately required to submit to a breath test or urinalysis. If the driver refuses to submit to testing for any reason, the driver will be informed that continued refusal will result in disqualification from performing any safety-sensitive function.
 - Employees will be asked to release any evidence relating to the observation for further testing. Failure to comply may subject the employee to subsequent discipline or suspension from driving duties. A receipt will be provided for all confiscated evidence with the signatures of both the receiving Site Manager and the provider.
 - If upon confrontation by the Site Manager, the driver admits to use but requests assistance, the alcohol and drug program administrator will provide the driver with information concerning programs that are available, with telephone numbers for the driver to call. However, Mark Dunning Industries has a no tolerance policy for people who use drugs or alcohol in excess.
- c. The Site Manager shall, within 24 hours or before the results of the controlled substance test are released, document the particular facts related to the behavior or performance problems, and present such documentation to the alcohol and drug program administrator.
- d. The site manager will remove or cause the removal of the driver from the company-owned vehicle, and ensure that the driver is transported to an appropriate collection site and thereafter to the driver's residence, or where appropriate, to a place of lodging. Under no circumstances will that driver be allowed to continue to drive a company vehicle or his/her own vehicle until a confirmed negative test result is received.
2. Post-Accident Testing: Currently, federal regulations place the burden of compliance with post-accident alcohol and drug testing regulations on the driver. Therefore, all drivers are required to provide a breath test and a urine specimen to be tested for the use of controlled substances "as soon as practicable" after any accident. The driver shall remain readily available for such testing or may be deemed by the alcohol and drug program administrator to have refused to submit to testing. No alcohol may be consumed for eight hours after the accident or until a test is conducted. If the driver is

seriously injured and cannot provide a specimen at the time of the accident, he/she shall provide the necessary authorization for obtaining hospital reports and other documents that would indicate whether there were any controlled substances in his/her system.

If the driver is involved in an accident, that driver will immediately notify the company at the following telephone number to receive further instruction to obtain the required post-accident test.

FOR POST-ACCIDENT TESTING NOTIFY:

TELEPHONE NUMBER: Contact Site manager for testing

An accident as defined by DOT regulations is one which results in the death of a human being or bodily injury to a person who, as a result of the injury, immediately receives medical treatment away from the scene of the accident; or which has had one or more of the vehicles incurring disabling damages as a result of the accident, requiring the motor vehicle to be towed from the scene of the accident. Except for a fatality accident, verification of the driver's responsibility must be established by a citation to the driver.

Drivers will be provided with collection kits to be carried in their vehicles at all times. R LC Trucking, LLC will provide pertinent instructions and procedures prior to allowing the driver to operate a CMV.

3. Random Testing: R LC Trucking, LLC will conduct random testing for all covered drivers as follows:
 - a. A company-wide selection process which removes discretion in selection from any Site Manager personnel will be adopted. This process will select covered drivers through the use of a scientifically valid method, such as a computerized program;
 - b. The random testing will provide for alcohol testing of at least ten percent (10%) and for drug testing of at least twenty five percent (25%) of the covered drivers, for each selection period;
 - c. The random testing will be reasonably spread throughout the calendar year; and
 - d. Once notified, a driver must proceed immediately to the assigned collection site. The driver will only be allowed normal transit time from the place of notification to the collection site.

COLLECTION OF BREATH AND URINE SPECIMENS AND LABORATORY ANALYSIS

- A. **BREATH ALCOHOL TESTING** - This testing will be conducted either on-site or at a prearranged location by a qualified BAT or Saliva Testing Technician according to 49 CFR Part 40, Subpart C procedures. Only devices listed on the Conforming Products List (CPL) will be utilized for testing required under this policy. Refusal to complete and sign the testing form or refusal to provide breath will be considered a positive test, and the driver will be removed from safety-sensitive functions until this is resolved.

- B. SPECIMEN COLLECTION - Specimen collection will be conducted in accordance with 49 CFR, Part 40, Subpart C, and any applicable state law. The collection procedures have been designed to ensure the security and integrity of the specimen provided by each driver, and those procedures will strictly follow federal chain-of-custody guidelines. Moreover, every reasonable effort will be made to maintain the dignity of each driver submitting a specimen for analysis in accordance with these procedures.
- C. LABORATORY ANALYSIS - As required by FMCSA regulations, only a laboratory certified by the Department of Health and Human Services (DHHS) to perform urinalysis for the detection of the presence of controlled substances will be retained by the company. The laboratory will be required to maintain strict compliance with federally approved chain-of-custody procedures, quality control, maintenance, and scientific analytical methodologies.

CONFIDENTIALITY

Under no circumstances, unless required or authorized by law, will alcohol or drug testing information or results for any employee or applicant be released without a written request from the applicable employee.

Drivers are entitled, upon written request, to obtain copies of any records pertaining to their driver's use of alcohol or controlled substances, including any records pertaining to their alcohol or controlled substance tests.

Collection of breath and urine samples must always be documented and sealed with a tamper-proof sealing system in the presence of the driver, to ensure that all tests can be correctly traced to the driver.

Drug test analysis from the DHHS-approved laboratory will be forwarded directly to the MRO assigned by the alcohol and drug program administrator.

Alcohol test results will be forwarded by the MRO to the alcohol and drug program administrator for confidential recordkeeping. Confidential recordkeeping is defined, for the purpose of this policy, as records maintained in a secure manner, under lock and key, with controlled access.

TRAINING REQUIREMENTS

- A. NEW DRIVERS - All new drivers will receive instruction in the contents of this policy prior to the operation of a vehicle for the company.
- B. DRIVERS - All drivers will be required to receive training in the contents of this policy whenever a change is made to the policy. This training will include memos, updated pages to be placed in that driver's copy of the policy, and discussions at the regularly scheduled safety meetings.
- C. DRIVER SITE MANAGERS - All personnel who have contact with the drivers will receive reasonable suspicion training. This training: will consist of 15 minutes of training on alcohol

misuse and 60 minutes of controlled substances use. This training shall cover the physical, behavioral, speech, and performance indicators of probable alcohol misuse and the use of controlled substances.

- D. PROGRAM ADMINISTRATOR - The program administrator will attend at least one professional seminar, from time to time related to alcohol and drug testing.

COMPLIANCE AUDITS

THIRD-PARTY AUDIT - The Company will utilize a third-party DOT compliance consulting service to conduct an on-site audit of the company's records and procedures relating to alcohol and controlled substances testing. A report will be provided to the company noting the violations and recommended corrective actions.

CONSEQUENCES FOR NON-COMPLIANCE

- A. DRIVER APPLICANTS - Driver applicants who test positive for controlled substances or alcohol will be denied employment.
- B. DRIVERS - Alcohol and drug abuse not only threatens the safety and productivity of all employees at R L C Oilfield Services, LLC, but it also causes serious individual health consequences to those who use them. Appendix A outlines several personal and social consequences which may result after abuse of controlled substances. Any confirmed prohibited actions while performing a safety-sensitive function or refusing to take a breath test will be grounds for disqualification as a driver.

A driver testing positive for alcohol or drug use is subject to disqualification. Refusal to submit to testing will also be considered a positive result.

Refusal may be defined as not providing a breath sample or urine as directed, neglecting to sign appropriate control forms, using alcohol within eight hours of an accident, or engaging in conduct that clearly obstructs the testing process.

Any driver testing positive for the presence of a controlled substance will be contacted by R L C Oilfield Services, LLC MRO. The driver will be allowed to explain and present medical documentation to explain any permissible use of a drug. All such discussions between the driver and the MRO will be confidential. R L C Trucking, LLC will not be a party to, or have access to, matters discussed between the driver and the MRO. If medically supportable reasons exist to explain the positive result, the MRO will report the test result to R L C Oilfield Services, LLC alcohol and drug program administrator as a negative.

If the MRO is unable to contact the driver directly, the MRO will contact the company to have the driver contacted and instructed to contact the MRO. If the driver fails to contact the MRO within five days of notification from the company, the MRO will report to the company a positive result.

Within 72 hours after the driver has been notified of a positive test result for drugs, he/she may request a retest of the split sample. This sign-out will be provided to the MRO in

writing, who will then initiate the new laboratory analysis. If a different result is detected by the subsequent laboratory, the test will be canceled by the MRO, and the company alcohol and drug program administrator will be notified.

Drivers who receive a positive alcohol test will be notified by the BAT. Drivers with positive alcohol tests will be provided transportation to their home or other suitable lodging, and then be subject to the consequences of this policy.

Drivers who violate will be provided a list of SAPs and must choose one to contact for an evaluation. **However, drivers will be released from their jobs with R LC Trucking, LLC.**

Drivers tested for alcohol and who are found to have an alcohol concentration of 0.02 or greater, but less than 0.04, will be placed out-of-service for a 24-hour period for the first offense. If the driver tests for alcohol and is found to have an alcohol concentration of 0.02 or greater, but less than 0.04, a second time during the course of the driver's employment, that driver will be subject to the evaluation, treatment, follow-up testing if required, and a negative return to duty test as authorized in this policy. A third violation during the course of the driver's employment will result in disqualification by the company. **However, drivers will be terminated from their jobs with R LC Trucking, LLC for the first offense.**

- C. PROGRAM ADMINISTRATOR AND SITE MANAGERS - Any associate who knowingly and willfully authorizes the use of, or utilizes the services of, a disqualified driver will be subject to termination for the first offense. All associates will maintain, or cause to be maintained, all documentation of testing and the testing process, for the time periods required in the FMCSR, and any federal, state, or local law or regulation and the requirements of this policy. Failure to maintain these documents will result in progressive disciplinary action and possible penalties as authorized in 49 CFR. All associates will be required to pay any costs incurred for individual penalties assessed to the associate as authorized in 49 CFR §521(b).

APPENDIX A

ALCOHOL AND DRUG EFFECTS

FMCSR §382.601(b)(11) mandates that all employees be provided with training material discussing the effects of alcohol and controlled substance use on an individual's health, work, and personal life.

This appendix is intended to help individuals understand the personal consequences of substance abuse.

ALCOHOL

Although used routinely as beverage for enjoyment, alcohol can also have negative physical and mood-altering effects when abused. These physical or mental alterations in a driver may have serious personal and public safety risks.

Health Effects

An average of three or more servings per day of beer (12 oz.), whiskey (1 oz.), or wine (6 oz.) over time, may result in the following health hazards:

- Dependency;
- Fatal liver diseases;
- Kidney disease;
- Pancreatitis;
- Ulcers;
- Decreased sexual functions;
- Increased cancers of the mouth, tongue, pharynx, esophagus, rectum, breast, and malignant melanoma;
- Spontaneous abortion and neonatal mortality; and
- Birth defects.

Social Issues

- 2/3rd of all homicides are committed by people who drink prior to the crime.
- 2-3% of the driving population is legally drunk at any one time. This rate doubles at night and on weekends.
- 2/3rd of all Americans will be involved in an alcohol-related vehicle accident during their lifetime.
- The separation and divorce rate in families with alcohol dependency problems is seven times the average.
- 40% of family court cases are alcohol-related.
- Alcoholics are 15 times more likely to commit suicide.
- More than 60% of burns, 40% of falls, 69% of boating accidents, and 76% of private aircraft accidents are alcohol-related.
- Over 17,000 fatalities occurred in 1993 in highway accidents, which were alcohol-related. This was 43% of all highway fatalities.
- 30,000 people will die each year from alcohol-caused liver disease.
- 10,000 people will die each year due to alcohol-related brain disease or suicide.
- Up to 125,000 people die each year due to alcohol-related conditions or accidents.

Workplace Issues

- It takes one hour for the average person (150 pounds) to process one serving of alcohol from the body.
- Impairment can be measured with as little as two drinks in the body.
- A person who is legally intoxicated is six times more likely to have an accident than a sober person.

DRUGS

Marijuana

Health Effects

- Emphysema-like conditions.
- One joint of marijuana contains cancer-causing substances equal to a half-pack of cigarettes.
- One joint causes the heart to race and be overworked. People with heart conditions are at risk.
- Marijuana is commonly contaminated with the fungus *Aspergillus*, which can cause serious respiratory tract and sinus infections.
- Marijuana lowers the body's immune system response, making users more susceptible to infection.
- Chronic smoking causes changes in brain cells and brain waves. The brain does not work as efficiently or effectively. Long-term brain damage may occur.
- Tetrahydrocannabinol (THC) and 60 other chemicals in marijuana concentrate in the ovaries and testes.
- Chronic smoking of marijuana in males causes a decrease in testosterone and an increase in estrogen, the female hormone. As a result, the sperm count is reduced, leading to temporary sterility.
- Chronic smoking of marijuana in females causes a decrease in fertility.
- A higher than normal incidence of stillborn births, early termination of pregnancy, and higher infant mortality rate during the first few days of life is common in pregnant marijuana smokers.
- THC causes birth defects including brain damage, spinal cord, forelimbs, liver, and water on the brain and spine in test animals.
- Prenatal exposure may cause underweight newborn babies.
- Fetal exposure may decrease visual functioning.
- User's mental function can display the following effects:
 - Delayed decision making;
 - Diminished concentration;
 - Impaired short-term memory;
 - Impaired signal detection;
 - Impaired tracking;
 - Erratic cognitive function; and
 - Distortion of time estimation

Workplace Issues

- THC is stored in body fat and slowly released.
- Marijuana smoking has long-term effects on performance.
- Increased THC potency in modern marijuana dramatically compounds the side effects.
- Combining alcohol or other depressant drugs with marijuana increases the impairing effects of both.

Cocaine

Used medically as a local anesthetic. When abused, it becomes a powerful physical and mental stimulant. The entire nervous system is energized. Muscles tense, heart beats faster and stronger, and the body burns more energy. The brain experiences an exhilaration caused by a large release of neurohormones associated with mood elevation.

Health Effects

- Regular use may upset the chemical balance of the brain. As a result, it may speed up the aging process by causing damage to critical nerve cells. Parkinson's Disease could also occur.
- Cocaine causes the heart to beat faster, harder, and rapidly increases blood pressure. It also causes spasms of blood vessels in the brain and heart. Both lead to ruptured vessels causing strokes and heart attacks.
- Strong dependency can occur with one "hit" of cocaine. Usually mental dependency occurs within days for "crack" or within several months for snorting coke. Cocaine causes the strongest mental dependency of all the drugs.
- Treatment success rates are lower than other chemical dependencies.
- Extremely dangerous when taken with other depressant drugs. Death due to overdose is rapid. Fatal effects are usually not reversible by medical intervention.

Workplace Issues

- Extreme mood and energy swings create instability. Sudden noise causes a violent reaction.
- Lapses in attention and ignoring warning signals increases probability of accidents.
- High cost frequently leads to theft and/or dealing.
- Paranoia and withdrawal may create unpredictable or violent behavior.
- Performance is characterized by forgetfulness, absenteeism, tardiness, and missing assignments.

Opiates

Narcotic drugs which alleviate pain and depress body functions and reactions.

Health Effects

- IV needle users have a high risk of contracting hepatitis or AIDS when sharing needles.
- Increase pain tolerance. As a result, a person may more severely injure themselves and fail to seek medical attention as needed.
- Narcotic effects are multiplied when combined with other depressants causing an increased risk for an overdose.
- Because of tolerance, there is an ever increasing need for more.
- Strong mental and physical dependency occurs.
- With increased tolerance and dependency combined, there is a serious financial burden for the users.

Workplace Issues

- Side effects such as nausea, vomiting, dizziness, mental clouding and drowsiness place the user at high risk for an accident.
- Causes impairment of physical and mental functions.

Amphetamines

Central nervous system stimulant that speeds up the mind and body.

Health Effects

- Regular use causes strong psychological dependency and increased tolerance.
- High doses may cause toxic psychosis resembling schizophrenia.
- Intoxication may induce a heart attack or stroke due to increased blood pressure.
- Chronic use may cause heart or brain damage due to severe constriction of capillary blood vessels.
- Euphoric stimulation increases impulsive and risk taking behavior, including bizarre and violent acts.
- Withdrawal may result in severe physical and mental depression.

Workplace Issues

- Since the drug alleviates the sensation of fatigue, it may be abused to increase alertness during periods of overtime or failure to get rest.
- With heavy use or increasing fatigue, the short-term mental or physical enhancement reverses and becomes impairment.

Phencyclidine (PCP)

Often used as a large animal tranquilizer. Abused primarily for its mood altering effects. Low doses produce sedation and euphoric mood changes. Mood can rapidly change from sedation to excitation and agitation. Larger doses may produce a coma-like condition with muscle rigidity and a blank stare. Sudden noises or physical shocks may cause a "freak out" in which the person has abnormal strength, violent behavior, and an inability to speak or comprehend.

Health Effects

- The potential for accidents and overdose emergencies is high due to the extreme mental effects combined with the anesthetic effect on the body.
- PCP, when combined with other depressants including alcohol, increases the possibility of an overdose.
- If misdiagnosed as LSD-induced and treated with Thorazine, can be fatal.
- Irreversible memory loss, personality changes, and thought disorders may result.

Workplace Issues

- Not common in workplace primarily because of the severe disorientation that occurs.
- There are four phases to PCP abuse:
 - Acute toxicity causing combativeness, catatonia, convulsions, and coma. Distortions of size, shape, and distorted perception are common.
 - Toxic psychosis with visual and auditory delusions, paranoia, and agitation.
 - Drug induced schizophrenia.
Induced depression which may create suicidal tendencies and mental dysfunction.

APPENDIX B

DRIVER NOTIFICATION LETTER

I certify that I have received a copy of and have read the above R L C Oilfield Services, LLC policy including the alcohol and drug testing procedures. I understand that as a condition of employment as a driver, I must comply with these guidelines, and do agree that I will remain medically qualified by following these procedures. If I develop a problem with alcohol or drug abuse during my employment with R L C Oilfield Services, LLC, I will seek assistance through the current alcohol and drug testing program administrator.

I also understand that if I become disqualified under FMCSR driver standards, lose my driver's license for any reason, or become uninsurable; I have self-terminated my employment with R L C Oilfield Services, LLC.

Signed

Date

Substance Abuse Resources

Information Hotlines

Alcoholics Anonymous (AA)	800-356-9996
American Council on Alcoholism Helpline	800-527-5344
Cocaine Hotline	800-347-8998
National Council on Alcoholism	800-NCA-HELP
National Institute on Drug Abuse Hotline (NIDA)	800-662-HELP
Narcotics Anonymous	800-338-8750
Al-Anon	800-356-9996

Narc-Anon

213-574-5800

National Association of Alcoholism & Drug Abuse Council (NAADAC)

1911 N. Ft. Myer Dr., Suite 900

Arlington, VA 22209

703-741-7686

R L C Oilfield Services,
LLC Bossier City, LA

**EMERGENCY RESPONSE AND
PREPAREDNESS PLAN**

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R L C Oilfield Services, LLC

Prairieville, LA

Emergency Response and Preparedness Plan

Introduction

The purpose of the R L C Oilfield Services, LLC Emergency Response and Preparedness Plan is to enhance the protection of lives and property through effective use of facility resources. Whenever an emergency affecting the facility reaches proportions that cannot be handled by routine measures, the Facility Manager or his designee may declare a state of emergency, and these contingency guidelines may be implemented. There are two general types of emergencies that may result in the implementation of this plan. These are:

1. Large- scale disorder, and
2. Large-scale natural or man-made disaster.

Since an emergency may be sudden and without warning, these procedures are designed to be flexible in order to accommodate contingencies of various types of magnitudes

Scope

These procedures apply to all personnel, buildings and grounds, owned and operated R L C Oilfield Services, LLC

Types of Emergencies

Types of emergencies covered by this manual are:

- Fire
- Weather, natural disaster
- Chemical or radiation spill
- Explosion, downed aircraft (crash) on the facility property.
- Bomb or bomb threat
- Civil disturbance or demonstrations
- Utility failure
- Violent or criminal behavior
- Medical and first aid (epidemic poisoning)
- Psychological crises

In addition there are sections on how to report all emergencies, building evacuation, and first aid.

Definitions of Emergencies

The Facility Manager, or designee, serves as the overall Emergency Director during a major emergency or disaster. The following definitions of an emergency are provided as guidelines to assist building area coordinators in determining the appropriate response:

Minor Emergency:

Any incident, potential or actual, which will not seriously affect the operation of the facility. Report these incidents immediately to the Corporate Offices at 225-454-0176.

Major Emergency:

Any incident, potential or actual, which affects an entire building or group of buildings (tanks included) and which will disrupt the operation of the facility. Outside emergency services will probably be required, as well as major efforts from facility support services. Major policy considerations and decisions will usually be required for the Corporate Safety Director in response to a major emergency report these incidents to the Corporate Offices at 225-454-0176.

This Emergency Response and Preparedness Plan is predicated on a realistic approach to the problems likely to occur at the facility during a major emergency or disaster. The following are general guidelines:

- An emergency or a disaster may occur at any time of the day or night, weekend or holiday, with little or no warning.
- The succession of events in an emergency are not predictable; therefore published support and operational plans will serve only as a guide and checklist, and may require field modification in order to meet the requirements of the emergency.
- Disasters may affect residents in the geographical location of the facility; therefore, city, parish, state and federal emergency services may be expected.
- A major emergency may be declared if information indicates that such a condition is developing or is probable.

DECLARATION OF FACILITY STATE OF EMERGENCY

The authority to declare a facility state of emergency rest with the Facility Manager, Corporate Safety Director, or designee, as follows:

During the period of any major emergency, the individual Terminal Facility Manager as required shall place into immediate effect the appropriate procedures necessary to meet the emergency, safeguards for persons and property, and maintain facility property. The Facility Manager shall immediately consult the Corporate Safety Director, or Safety Supervisor, regarding the emergency and the possible need for a declaration of a campus state of emergency.

When this declaration is made, only R L C Oilfield Services, LLC employees, support personnel (i.e. persons required by contract or service agreement) are authorized to be on facility property. Those without legitimate business on the facility or without proper identification will be asked to leave the facility premises. Unauthorized persons remaining on the facility may be subject to arrest in accordance with Louisiana law or Texas law as applicable

In addition, only those operators and personnel who have been assigned emergency resource team duties or issued an emergency pass by the Facility Manager will be allowed to enter the immediate disaster site.

In the event of floods, tornado, hurricane, fires, thunderstorms, or major disasters occurring in or about the facility property, or which involve facility personnel, the Facility Manager will dispatch the available personnel on duty at the time to determine the extent of damage to company property.

DIRECTION AND COORDINATION

Emergency Coordinator

The Facility Manager, Corporate Safety Director, or Terminal Manager, shall coordinate all emergency operations or his/her designee alternate. The director operational control of the facility major emergency or disaster is the sole responsibility of the Corporate Safety Director or his/her designee. The coordination of facility emergency resource teams is the responsibility of the Facility Manager who will coordinate all facility emergency functions as directed.

EMERGENCY COMMAND POST

When a major emergency occurs, or is eminent, it shall be the responsibility of the R L C Oilfield Services, LLC Terminal Facility Manager to set up and staff the appropriate Emergency Command Post as directed. The regular facility offices are to be kept fully operational at all times, if possible. If the emergency involves a large portion of the facility property the Command Post is to be set up at the most logical central location away from the immediate area of the disaster. At least one-operator or facility personnel is to staff the Command Post at all times until the emergency situation ends. The Facility Manager for operations of the combined on-site emergency team shall establish a marshal area for outside and local agency assistance. A conference room with facilities for emergency teams or media crews, and which is designated to accommodate multiple telephone and/or electrical appliances is desirable.

FIELD EMERGENCY COMMAND POST

If the emergency involves only one building or a small part of the facility a company service vehicle is to be placed as near the emergency scene as is reasonably possible. At least one operator or facility personnel is to staff the command post at all times or until the emergency ends. A small office with a desk, chairs, and a telephone may also be required near the scene. Field Emergency Command Post Equipment to include:

- Barricades, barrier tape, and signs for the scene
- Two portable hand-held radios
- Portable public address system
- First aid kit
- Company and local telephone directory

FACILITY EMERGENCY RESOURCE TEAM

In addition to establishing an Emergency command Post as necessary, the Facility Manager shall immediately begin contacting all members of the R L C Oilfield Services, LLC Emergency Resource Team, which consists of the following:

- | | |
|-----------------------------|-----------------------------|
| • Emergency Coordinator: | Corporate Safety Director |
| • Damage Control: | Safety Supervisor |
| • Facility Security: | On Duty Operator |
| • Public Information: | In House Counsel |
| • Environmental Compliance: | Director of Human Resources |

Team members may coordinate as necessary with the Emergency Coordinator for implementation and coordination of facility operation plan and support as it pertains to their areas. Team members are to be kept in constant communication with the Emergency Command Post. General responsibilities of the team members are listed below:

Emergency Coordinator

1. Is responsible for the overall coordination of the Facility Response;
2. Determines the type and magnitude of the emergency and establishes the appropriate Emergency Command Post
3. Initiates immediate contact with the company president, begins assessment of the facility condition;
4. Notifies and utilizes available facility personnel, local agencies to maintain safety and order;
5. Notifies the members of the Emergency Resource Team, advises them of the nature of the emergency;
6. Insures that appropriate notification is made to off site personnel when necessary;
7. Performs other related duties as may be directed by virtue of the facility emergency; and

8. Prepares and submits a report to the Company President appraising the final outcome of the emergency.

Damage Control:

1. Provides equipment and personnel to perform shutdown procedures, hazardous area control, barricades, damage assessment, debris clearance, emergency repairs, and equipment protection;
2. Provides vehicles, equipment and operators for movement of personnel and supplies, assigns vehicles as required to the Emergency Resource Team for emergency use;
3. Obtains the assistance of utility companies as required for emergency operations;
4. Furnishes emergency power and lighting systems as required;
5. Surveys habitable space and relocates essential services and functions;
6. Provides facilities for emergency regenerator fuel during actual emergency or disaster periods;
7. Provides for storage of vital records at an alternate site; and
8. Coordinates with building and area coordinators for liaison and necessary support.

Facility Security and Communication:

1. Maintains all communications capabilities in a state of constant readiness;
2. Notifies Facility Manager of major emergencies;
3. Monitors facility emergency warning and evacuation systems;
4. Takes immediate and appropriate action to protect life, property, and safeguard records and documents as necessary;
5. Provides traffic control, access control, perimeter and internal security patrol and fire prevention services as needed; and
6. Provides and equips an alternate site for the Command Post.

Public Affairs:

1. Establishes liaison with the news media for dissemination of information as requested by the Company President;
2. Establishes liaison with the local radio and television service for public announcements;
3. Arranges the photographic and audio visual services;
4. Advises the President or designee of all news concerning the extent of disaster affecting the facility; and
5. Prepares news releases for approval and release to the media concerning the emergency.

RESPONSIBILITIES

Company President

The Company President or his designated alternate as Facility Emergency Director is responsible for the overall direction of facility emergency operations as outlined in the Emergency Resource Team section of this guide.

Administrators, Department Heads and Managers

1. Building evacuation information shall be distributed to all employees with follow up discussions, on-the-job training or explanation as required;
2. Time shall be allowed for training employees in emergency techniques such as fire extinguisher usage, first aid, CPR and building procedures; and
3. Contact Corporate Safety for assistance.

Managers and Supervisors

1. Educate employees concerning facility emergency procedures as well as evacuation procedures for their building and activity;
2. Inform their personnel and staff of an emergency and initiate emergency procedures as outlined in this guide;
3. Evaluate, survey and estimate their assigned building facility or activity in order to determine the impact a fire or tornado could have on their facility; report all safety hazards to the Facility Manager; submit work orders to reduce hazards and to minimize accidents to the Physical plant promptly; and
4. Inform all personnel and contract employees present at the time of an emergency to conform to building evacuation guidelines during any emergency and to report a designated assembly area outside the building where a head count can be taken.

FACILITY NOTIFICATION SYSTEM

The telephone is the primary means of emergency notification at all R L C Oilfield Services, LLC. This system is intended for the immediate transmission of specific information regarding an emergency to all affected areas on the facility property.

Operator on Duty

The R L C Oilfield Services, LLC manager on duty is the focal point for two-way transmission of official emergency telephone communications to company department heads. Each department head, division manager, or director, upon receiving notification of a facility emergency, is to pass the same information along to those departments/offices under his/her direction.

IMPORTANT:

During an emergency facility phone, lines must be restricted to facility official notification only. In the absence of phone service, the operator(s) on duty may provide runners for emergency notification or personnel cell phones (contingent on available personnel).

ON/OFF SITE SOURCES OF ASSISTANCE DURING EMERGENCIES

On Site Assistance

Operations office: 225-454-0176

Hours of Operation: 9 hours a day, 5 days a week, excluding holidays.

Maintenance: 225-454-0176 Prairieville, LA facility

Hours of operation: Monday through Friday, 7:00am - 5:00 pm and on short notice at other times. Capable of providing or arranging for the following emergency services.

Utilities: Repair to water, gas, electrical and sewer systems.

Structures: Repairs to structures and mechanical equipment.

Equipment: Portable pumps, generators, floodlights, welders, air compressors, tractors, backhoes, etc.

Transportation: Service vehicles, light trucks, dump trucks, and tractor/trailer units.

After 5:00pm and weekends, contact 225-454-0176.

Purchasing:

Emergency procurement of materials and services can be arranged in direct support of any contingency. During a major emergency, items will be received at the affected terminal location.

Note: *In the event of a disaster; in which major structural damage is sustained, it is advisable to turn off hazardous utilities.: electricity and natural gas are of primary concern.*

EMERGENCY PROCEDURES GUIDE

Facility Emergency Guidelines

This section contains the recommended procedures to be followed during specific types of emergencies. The procedures should always be followed in sequence, unless conditions dictate otherwise.

Specific Emergency Procedures

Reporting Emergencies

Building Evacuations

Civil Disturbances or Demonstrations

Explosion, Aircraft Crash on Facility Property

Weather, Natural Disaster

Medical and First Aid

Chemical or Radiation Spill

Bomb Threat

Fire

Violent or Criminal Behavior

Utility Failure

Media Relations

Psychological

Reporting Emergencies

To report an emergency 225-454-0176 Corporate Office

When calling to report an emergency: stay calm, give your name and carefully explain the problem and location (the person whom you are speaking to will be taking all this information down for a record). **DO NOT HANG UP UNTIL TOLD TO DO SO.**

Keep calm and help keep others calm!

Facility Manager: _____

Location: _____

Telephone: _____

Facility Emergency Team Members:

IMPORTANT:

After an evacuation, report to your designated assembly point. Stay there until an accurate head count has been taken. The facility manager will take attendance and assist in accounting for all building occupants.

EVACUATION PROCEDURES

In an emergency call the Corporate Office 225-454-0176.

Building Evacuation

1. All building evacuations will occur when an alarm sounds and/or upon notification by the facility manager or operator on duty.
2. When the building evacuation alarm is activated during an emergency, leave by the nearest marked exit and alert others to do the same.
3. Assist handicapped individuals in exiting the building! Remember handicapped persons will need assistance on stairs, steps, or elevators.
4. Once outside proceed to a clear area at least 500 feet away from the affected building. Keep street, fire lanes, hydrant access, and walkways clear for emergency vehicles and traffic. Know your assembly points.
5. DO NOT return to an evacuated building unless told to do so by the incident commander.

IMPORTANT:

After an evacuation, report to your designated assembly point. Stay there until an accurate head count has been taken.

Facility Wide Evacuation:

1. All facility building evacuations will occur when an alarm sounds and/or upon notification by the Facility Manager, Corporate Safety Director, or Incident commander on-scene.
2. When the building evacuation alarm is activated during an emergency, leave by the nearest marked exit and alert others to do the same.
3. Assist any handicapped individuals in exiting the building
4. Once outside proceed to a clear area at least 500 feet away from the affected building. Keep street, fire lanes, hydrant access, and walkways clear for emergency vehicles and traffic. Know your assembly points inside the facility and outside if warranted by the circumstances.
5. DO NOT return to an evacuated building unless told to so by the incident commander.

IMPORTANT:

After an evacuation, report to your designated assembly point. Stay there until an accurate head count has been taken.

CIVIL DISTURBANCE OR DEMONSTRATIONS

Most demonstrations such as marches, meetings, picketing and rallies will be peaceful and non-obstructive in nature. However if persons attempt to congregate on facility property or one of the following conditions exists as a result of the demonstration:

- Interference with the normal operations of the facility in any way
- Prevention of access to office, racks, tanks, buildings or any other facility property.
- Threat of physical harm to persons or damage to facility property.

If any of these conditions exist, the appropriate Sheriff's Office should be notified immediately at 911. The on-duty operator or Facility Manager should also contact the corporate office and make appropriate notification.

Non-disruptive Demonstrations

1. Generally, demonstrations of this kind should not be interrupted. Demonstrations should not be obstructed or provoked and efforts should be made to conduct terminal business as normally as possible.
2. If demonstrators are asked to leave, but refuse to leave by regular facility closing time:
 - a. Arrangements will be made to coordinate with representatives of the Ouachita Parish Sheriff's Office to monitor the situation during non-business hours, or
 - b. Determination will be made to treat the violation of regular closing hours as a disruptive demonstration.

Disruptive Demonstrations

1. In the event that a demonstration blocks access to the terminal facilities or interferes with the operation of the facility:
2. Demonstrators will be asked to terminate the disruptive activity by facility manager or Sheriff's Department representative on site.
3. If demonstrators persist in the disruptive activity they will be apprised that failure to discontinue may result in arrest. Except in extreme emergencies the Company President will be consulted before such measures are taken.
4. Efforts should be made to secure positive identification of demonstrators in violation to facilitate later testimony, including photographs/video if deemed necessary.
5. After consultation with the Company President, In-House Counsel, and appropriate law enforcement officials, the need for an injunction and arrest will be determined.
6. If determination is made to arrest the demonstrators, they should be so informed and warned of the intention of arrest.

EXPLOSION OR AIRCRAFT CRASH ON SITE

1. In the event a mishap occurs such as an explosion or aircraft crash on site:
2. Immediately take cover under tables, desks and other objects that will give protection against falling glass or debris.
3. After the *effects* of the explosion and/or fire have subsided, notify the appropriate Sheriff's Office, Barksdale Air Force Base Security Division, Federal Aviation Administration, Louisiana State Police, Corporate Offices (include phone numbers of each) Give your name, location and nature of the emergency.
4. If necessary, or when directed to do so, activate building alarm. THERE MAY NOT BE A BUILDING ALARM IN ALL BUILDINGS - you must report the emergency by telephone in buildings without it.
5. When the building evacuation alarm is activated during an emergency, leave by the nearest marked exit and alert others to do the same.
6. Assist handicapped individuals in exiting buildings
7. Once outside proceed to a clear area at least 500 feet away from the *affected* area or building(s). Keep street, fire lanes, hydrant access, and walkways clear for emergency vehicles and traffic. Know your assembly points.
8. DO NOT return to an evacuated building unless told to do so by an official agency representative or the incident commander.

IMPORTANT:

After an evacuation, report to your designated assembly point Stay there until an accurate head count has been taken. The incident commander or his designee will take attendance and assist in accounting for all building/facility occupants.

WEATHER/NATURAL DISASTER

1. If indoors, seek refuge in the inner most room on the lowest level (or designated safe area) away from windows and doors.
2. If outdoors, seek shelter in the nearest building and go to the designated safe area.

CHEMICAL, FLAMMABLE OR COMBUSTIBLE SPILL

1. Any spillage of a hazardous chemical, flammable or combustible material spill is to be reported immediately to the Corporate Safety Department at 225-454-0176.
2. When reporting, be specific about the nature of the involved material and exact location. The Safety Department will make notification to the necessary specialized authorities and medical personnel if required.
3. The site should be evacuated and the affected area should be sealed off to prevent further contamination of other areas.
4. Anyone who may be contaminated by the spill is to avoid contact with other as much as possible, remain in the vicinity and give their names to the Safety Department. Required first aid and clean up by specialized units should begin at once.
5. If an emergency exists, activate the facility alarm. Caution: There may not be alarms in all buildings; you must report the emergency by telephone in those areas without alarms.
6. When the building evacuation alarm is activated during an emergency, leave by the nearest marked exit and alert others to do the same.
7. Assist handicapped individuals in exiting the building!
8. Once outside proceed to a clear area at least 500 feet away from away from the affected building. Keep street, fire lanes, hydrant access, and walkways clear for emergency vehicles and traffic. Know your assembly points.
9. DO NOT return to an evacuated building unless told to do so by the Incident Commander.

IMPORTANT:

After an evacuation, report to your designated assembly point. Stay there until an accurate head count has been taken.

MEDICAL AND FIRST AID

1. If serious injury or illness occurs on the facility property immediately call 911. Be prepared to give the nature of the call (describe the nature and severity of the problem), your exact location and you name. Notify the Corporate Safety Department of the 911 call.
2. In the case of serious injury or illness only trained certified personnel should assist the victim.
3. Every facility location should have a person trained in first aid and CPR. Training efforts should be coordinated through the Safety Department.

BOMB OR BOMB THREATS

1. If you observe a suspicious object or potential bomb on the facility property, **DO NOT HANDLE THE OBJECT!** Clear the area and immediately call the Corporate Office at **225-454-0176**.
2. Any person receiving a phone call bomb threat should ask the caller:
 - a. When is the bomb going to explode?
 - b. Where is the bomb located?
 - c. What kind of bomb is it?
 - d. What does it look like?
 - e. Where did you place the bomb?
3. Keep talking to the caller as long as possible and record the following information:
 - a. Time of the call
 - b. Estimated age and sex of the caller
 - c. Speech pattern, accent, possible nationality, etc.
 - d. Emotional state of the caller
 - e. Background noise
 - f. Immediately notify the Corporate Office at 225-454-0176
4. The Safety Department will notify appropriate law enforcement agencies.
5. Employees are requested to make a cursory inspection of their area for suspicious objects and report the location to the Police. **DO NOT TOUCH THE OBJECT! DO NOT** open drawers, cabinets or turn lights on or off.
6. If an emergency exists, activate the facility alarm system.
7. When the evacuation alarm is activated during an emergency leave by the nearest marked exit and alert others to do the same.
8. Assist handicapped individuals in exiting buildings
9. Once outside proceed to a clear area at least 500 feet away from the affected building. Keep street, fire lanes, hydrant access, and walkways clear for emergency vehicles and traffic. Know your assembly points.
10. **DO NOT** return to an evacuated building unless told to do so by the Incident Commander.

IMPORTANT:

After an evacuation report to your designated assembly point. Stay there until an accurate head count has been taken.

FIRE

1. Know the location of the fire extinguishers, fire exits, and alarm systems in your area and know how to use them.
2. If a minor fire appears to be controllable, IMMEDIATELY call 911 for the Fire Department. Notify the Corporate Safety Department that the Fire Department has been contacted. Direct the charge of the fire extinguisher toward the base of the flame.
3. On larger fires that do not appear to be controllable, IMMEDIATELY call 911 for the Fire Department. Notify the Corporate Safety Department that the Fire Department has been contacted. Evacuate all rooms, closing all doors to confine the fire and reduce oxygen. Do not lock the doors.
4. If an emergency exists, activate the building alarm, if no alarm exist make notification by telephone.
5. When the evacuation alarm is activated during an emergency, leave by the nearest marked exit and alert others to do the same.
6. Assist handicapped individuals in exiting the building!
7. Once outside proceed to clear area at least 500 feet away from the affected building. Keep street, fire lanes, hydrant access, and walkways clear for emergency vehicles and traffic. Know your assembly points.
8. **DO NOT** return to an evacuated building unless told to do so by the Incident Commander.

Note:

If you become trapped in a building during a fire and a window is available, place an article of clothing (shirt, coat, etc.) outside the window as a marker for rescue crews. If there is no window, stay near the floor where the air will be less toxic. Shout at regular intervals to alert emergency crews of your location. **DO NOT PANIC!**

UTILITY FAILURE

1. In the event of a major utility failure occurring during the regular working hours (7:00 am - 5:00 pm, Monday through Friday) immediately notify the supplying Power Company at customer service.
2. If there is potential danger to the building occupants, or if the utility failure occurs after hours, weekends or holidays notify the Corporate Safety Department.
3. If an emergency exists, activate the alarm.
4. When the building evacuation alarm is activated during an emergency, leave by the nearest marked exit and alert others to do the same.
5. Assist handicapped individuals in exiting the building
6. Once outside proceed to a clear area at least 500 feet away from the affected building. Keep street, fire lanes, hydrant access, and walkways clear for emergency vehicles and traffic. Know your assembly points.
7. **DO NOT** return to an evacuated building unless told to do so by the Incident Commander or utility company representatives.

Additional Notes:

It is advisable to have flashlights and a portable radio available for emergencies

In the case of:

Plumbing failure/flooding: cease using all electrical equipment. Vacate the area if necessary.

Serious gas leak: cease all operations. Do not turn on any lights or other electrical equipment.

Steam line failure: vacate the area if necessary.

If smoke odors come from the ventilation system, cease all operations and vacate the area.

VIOLENT OR CRIMINAL BEHAVIOR

1. All employees, vendors and invitees are asked to assist in making the facility a safe place by being alert to suspicious situations and promptly reporting them.
2. Notify the local law enforce agency (see emergency call list) as soon as possible to report he incident and be prepared to provide the following information:
 - a. Nature of the incident
 - b. Location of the incident
 - c. Description of the person(s) involved.
 - d. Description of property involved.
3. If you observe a criminal act or suspicious person(s) or activity, call the local law enforcement agency immediately to report the incident
4. Contact the Corporate Safety Department and provide information.
5. Assist the officer by supplying necessary information and encourage others to cooperate.
6. Should gunfire or discharged explosives hazard the facility, you should take cover immediately using all available concealment. After the disturbance seek emergency first aid if necessary.

What to do if taken hostage:

1. Be patient. Time is on your side. Avoid drastic action.
2. The initial 45 minutes are the most dangerous. Follow instructions, be alert and stay alive. The captor is emotionally unbalanced. Don't make mistakes that could hazard your well-being.
3. Don't speak unless spoken to and only when necessary. Agree with the captor; avoid using the word "NO". Don't talk down to the captor who may be in an agitated state. Avoid appearing hostile. Maintain eye contact with the captor at all times if possible, but do not stare. Treat the captor like royalty.
4. Try to rest. Avoid speculating. Comply with instructions as best you can. Avoid arguments. Expect the unexpected.
5. Be observant. You may be released or escape. The personal safety of others may depend on your memory.
6. Be prepared to answer the mediator on the phone. Be patient, wait. Attempt to establish a rapport with the captor. If medications, or first aid, or restroom privileges are needed by anyone, say so. The captors in all probability do not want to harm persons held by them. Such direct action further implicates the captor in additional offenses.

PSYCHOLOGICAL CRISIS

A psychological crisis exists when an individual is threatening harm to himself/herself or others, or is out of touch with reality due to severe drug reactions or to psychotic break. A psychotic break may be manifested by hallucinations, uncontrollable behavior, or the person may be a hospital walk-away.

If a psychological crisis occurs:

- Never try to handle a situation you feel is dangerous on your own.
- Notify the local law enforcement agency immediately. Clearly state that you need immediate assistance, give your name, location and the area involved.
- Contact the Corporate Safety Department.

R L C OILFIELD SERVICES, LLC

DRIVER HANDBOOK TABLE OF CONTENTS

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2. RLC Safety Policy
3. Inspection & Maintenance Policy
4. Drug Policy
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**TRANSPORTATION OF HAZARDOUS
MATERIALS AND WASTE**

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Synopsis

The purpose of this section is to provide information regarding the application of the Department of Transportation (DOT) regulations to hazardous materials transported by or offered by RLC OILFIELD SERVICES, LLC personnel. The section applies to all RLC OILFIELD SERVICES, LLC facilities, work sites, and employees.

Initial Implementation Requirements:

- Appoint a Designated Person to coordinate hazardous material transportation
- Identify Scope of Applicability at Site/Facility Operations with the Requirements of this Section
 - ▶ Identify all hazardous materials transported by RLC OILFIELD SERVICES, LLC employees
 - ▶ Identify all hazardous materials and wastes transported by a contracted service provider
 - ▶ Prepare a "short list" of site-specific hazardous material and hazardous waste shipping descriptions.

Recurring and Annual Task Requirements:

- Meet with Transporter to Identify and Verify Shipping Descriptions, Labeling and Marking to be used on Containers and Shipping Documents during Length of Contract.
- Periodically (at least semi-annually), Inventory Types and Quantities of Hazardous Materials Transported Off-site by RLC OILFIELD SERVICES, LLC Personnel for Use at Remote Work Locations (3.6)
- Train Affected Personnel in Their Role of Ensuring Compliance with DOT and EPA Transportation Requirements (3.6, 3.10)
- Inspect Labeling, Marking and Paperwork Prepared by Transportation Service Provider Prior to Signing Shipping Document and Releasing Hazardous Materials/Hazardous Waste for Transportation (3.6)
- Ensure Signed Copy of Hazardous Waste Manifest is Returned From the Treatment, Storage and Disposal Facility (TSDF) Within 45-Days

RLC OILFIELD SERVICES,

Transportation of Hazardous Materials and Waste Checklist		YES	NO	NA
1.	Has the work site identified all the hazardous materials regulated by the U.S. Department of Transportation (DOT) that are transported by RLC OILFIELD SERVICES, LLC employees?	-	-	-
2.	Have all RLC OILFIELD SERVICES, LLC employees who transport these hazardous materials received instruction on proper labeling and marking as well as methods to secure these materials during transport?	-	-	-
3.	Have all DOT hazardous materials that are transported from the facility or work site by a contracted hauler been identified?	-	-	-
4.	Has a listing been prepared for each DOT hazardous material identifying the material, its proper shipping name, the appropriate markings, and allowable shipping containers to be used?	-	-	-

TRANSPORTATION OF HAZARDOUS MATERIALS AND WASTE

1.1 Purpose and Scope

RLC OILFIELD SERVICES, LLC personnel provides specific guidance for transportation of hazardous materials.

1.2 Definitions

Labeling	The application of hazard warning labels as prescribed in the Hazardous Materials Table.
Marking	The descriptive name, instructions and cautions designated for a hazardous material in 49 CFR 172.300. Marking includes the proper shipping name, the identification number, other regulated material (ORM) designations, internal packaging, and specific requirements for various types of tanks.
Operating Unit	RLC OILFILED SERVICES, LLC
Placarding	The application of DOT-designed hazard warning sign(s) to the outside of the shipping vehicle.

1.3 Transportation of Hazardous Materials

1.3.1 Hazardous Material Table

The DOT designates materials as hazardous by listing them upon the Hazardous Materials Table (HMT). The HMT is an alphabetical list of commodities or items that identifies:

- a. The material's hazard class or that the material is forbidden in transportation
- b. The proper shipping name or direction to the preferred proper shipping name
- c. Specific references or references to requirements in the HMR pertaining to labeling, packaging, quantity limits aboard aircraft and stowage of hazardous materials aboard vessels.

The HMT consists often (10) columns of information that is used to fulfill the requirements for a given shipment. The HMT is found in [49 CFR 172.101](#). Due to its length and on-going potential for revision, reference a current copy at [DOT HMT](#).

Appendix A to the HMT is the List of Hazardous Substances and Reportable Quantities. The Appendix lists materials and their corresponding reportable quantities (RQs) that are designated as "hazardous substances" by CERCLA. It is used to determine the need for additional information to be provided on shipping documents and containers. Because the EPA has the legal responsibility to determine the reportable quantities for the DOT, these RQs can be found in Appendix B to this manual.

1.3.2 Shipping Papers

Anyone who offers a hazardous material for transportation is required to describe the material on a shipping paper as specified in [49 CFR 172.200-204](#). This document accompanies the shipment to its destination and serves as a record of the shipment, the transporter used and final disposition of the hazardous materials shipped from RLC OILFIELD SERVICES, LLC facilities and work locations.

1.3.2.1 General Entries

While non-regulated items may be included on the same shipping paper as regulated hazardous materials, the hazardous material entries must be identified as denoted in §172.201(a)(1).

1.3.2.2 Contents

1.3.2.2.1 All copies of shipping papers must be legible and printed (mechanically or manually) in English.

1.3.2.2.2 Unless allowed, no abbreviations may be used in the description.

1.3.2.2.3 Additional information about the material may be added, but it must be placed after the "basic description."

1.3.2.2.4 If more than one sheet is necessary, ensure that it is sequentially numbered indicating the number of pages (i.e., 1 of 4 pages).

1.3.2.3 Emergency Response Telephone Number

A 24-hour emergency response telephone number for use in the event of an emergency involving the shipped hazardous material must be provided on the shipping paper. The number must have immediate access to a person who is knowledgeable of the material and emergency response mitigation information for the material

1.3.2.4 Description of Hazardous Material on Shipping Papers

The "shipping description" of a hazardous material on shipping papers must include the following items in the following order:

- 1.3.2.4.1 The proper shipping name as prescribed in column 2 of the HMT
- 1.3.2.4.2 The hazard class or division prescribed in column 3 of the HMT
- 1.3.2.4.3 The identification number prescribed in column 4 of the HMT
- 1.3.2.4.4 The packaging group in roman numerals prescribed (if any) in column 5 of the HMT, preceded by "PG"
- 1.3.2.4.5 The total quantity, by net or gross mass, capacity or other appropriate units (use of abbreviations is allowed).
- 1.3.2.4.6 Empty packaging - a description for a packaging containing the residue of a hazardous material may include "Residue: Last Contained" in association with the basic description of the hazardous material last contained in the package.
- 1.3.2.4.7 Elevated temperature materials - the word "HOT" must be noted preceding the proper shipping name if a liquid material meets the definition in §171.8.
- 1.3.2.4.8 Organic peroxides (Class 5.2) and self-reactive (Class 4.1) materials must include additional information as required by 49 CFR 172.203(o).
- 1.3.2.5 Each shipping document must contain a certification as specified in 49 CFR 172.204 to assure that the described materials have in all respects met the applicable requirements of the DOT. Additional certification requirements are specified for transport by cargo and passenger aircraft and for radioactive materials.

1.3.3 Marking and Labeling

When a material is offered for shipment, each container must be properly marked and labeled. While one often assumes these terms have the same meaning, the DOT specifies two distinct regulatory programs to accomplish the identification of hazardous materials.

Marking is defined by the DOT as the application of the descriptive name, instructions and cautions designated in 49 CFR 172.300. Marking includes the proper shipping name, the identification number, ORM designations, internal packaging, and specific requirements for portable tanks, cargo tanks, tank cars, and radioactive materials. This information may be applied directly to the container with paint, marker, etc. or on an adhesive-backed sticker.

Labeling requirements are found in 49 CFR 172.400 and specify the application of hazard warning labels prescribed in the HMT. Additional labeling requirements are specified for radioactive materials and multiple hazard materials and packaging.

In general, labeling is the application of the DOT hazard warning labels specified in the HMT and marking is the application of other required information on the container.

1.3.3.1 Marking

Anyone who offers a hazardous material for transport must mark each package, freight container and transport vehicle containing a hazardous material according to 49 CFR 172 Parts 300-338.

The following summary identifies selected markings for hazardous materials in non-bulk packaging:

- 1.3.3.1.1 The proper shipping name as it appears in the DOT HMT column 2 (49 CFR 172.301).
- 1.3.3.1.2 The identification number as it appears in column 4 of the DOT HMT. The number is not required on packages of "limited quantities" or ORM-D material.
- 1.3.3.1.3 The proper shipping name for a hazardous waste is not required to include the word "waste" if the package bears the EPA marking as required by 40 CFR 262.32.
- 1.3.3.1.4 The technical chemical name of the hazardous material or substance must be marked.

in parentheses if column 1 of the HMT indicates a "G", and/or the selected shipping name does not otherwise identify the chemical/material (49 CFR 172.301 and 172.324).
- 1.3.3.1.5 Packages containing inner containers of liquid hazardous material must be marked with the "this end up" an-ow designation. There are numerous exceptions to this requirement (see 49 CFR 172.312).
- 1.3.3.1.6 The words "Inhalation Hazard" must be marked on packages of poisonous inhalation materials (49 CFR 172.313).
- 1.3.3.1.7 Materials classified as a consumer commodity must be marked ORM-D or ORM-D-Air if being transported by air (49 CFR 172.316).
- 1.3.3.1.8 Marine pollutants shipped by vessel and/or in bulk quantities must be marked as specified (49 CFR 172.322).
- 1.3.3.1.9 The letters "RQ" (for reportable quantity) must be displayed in association with the proper shipping description for each package containing the reportable quantity of a hazardous substance (49 CFR 172.313).

The required markings must be:

- Durable
- In English
- Printed or affixed to the surface of a package or a label, tag or sign.
- Displayed on a background of a contrasting color.
- Unobstructed by labels or attachments
- Located away from any other marking (i.e. advertising) that could substantially reduce its effectiveness.

1.3.3.2 Labeling

Each person who offers for transport or transports a hazardous material in a non-bulk

package, a bulk packaging or over pack with a capacity less than 640 cubic feet or portable tank with a capacity of less than 1,000 gallons must label the hazardous material as required in column 6 of the HMT. Labeling requirements are found in 49 CFR 172 Parts 400-450.

The following summary identifies selected labeling requirements.

- 1.3.3.2.1 Packages must be labeled with the proper DOT label as shown in column 6 of the HMT (49 CFR 172.400).
- 1.3.3.2.2 **Subsidiary Hazard Labels.** Some substances have more than one hazardous characteristic. The DOT regulations require that some of these materials be labeled with more than one label to reflect the additional hazard. Column 6 specifies the required labels (49 CFR 172.402).
- 1.3.3.2.3 **Radioactive materials** that also meet the definition of one or more additional hazards must be labeled as radioactive material as well as for each additional hazard (49 CFR 172.403).
- 1.3.3.2.4 **Mixed Packaging.** When hazardous materials having different hazard classes are packed in the same container or overpack, the outside packaging must be labeled for each hazard class of the hazardous material in the container (49 CFR 172.404).
- 1.3.3.2.5 **Consolidated Packaging.** When two or more packages containing compatible HM are placed within the same outside container or overpack, the outside container or overpack must be labeled for each hazard class of the HM contained therein (49 CFR 172.404).
- 1.3.3.2.6 Labels may not be modified unless authorized in 49 CFR 172.405.
- 1.3.3.2.7 Labels must be printed on or affixed to the surface of the package near the proper shipping name (49 CFR 172.406).
- 1.3.3.2.8 DOT labels must meet the criteria listed in 49 CFR 172.407.
- 1.3.3.2.9 The word "toxic" can be used in lieu of the word "poison" on the Poison label.
- 1.3.3.2.10 Labeling exemptions exist for numerous materials and packages. See 49 CFR 172.400a. Labels must be:
 - 1.3.3.2.10.1 Printed or affixed to a surface (other than the bottom) of the package.
 - 1.3.3.2.10.2 Placed near the proper shipping name marking.
 - 1.3.3.2.10.3 When a subsidiary label or multiple labels are required, it must be placed within 6-inches of the primary hazard label.
 - 1.3.3.2.10.4 Clearly visible and may not be obscured by markings.

1.3.4 Placarding

The DOT regulations require placarding of shipments of hazardous materials depending on the hazard class and quantity. Hazardous material placards look very much like hazardous material warning labels in terms of shape, color, and design. Placards are used to alert people of the potential dangers associated with the type of hazardous material being

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transported in a motor vehicle, railcar, freight container, cargo tank, or portable tank. They also guide emergency personnel in their response to spills or accidents involving the hazardous material.

1.3.4.1 Each person who offers for transportation or transports any hazardous material must utilize the appropriate placards. 40 CFR 262.33 requires a generator of hazardous waste to placard or offer the initial transporter the appropriate placards.

1.3.4.2 A hazardous material must be placarded as specified in Tables 1 and 2 of 49 CFR 172.504.

1.3.4.2.1 Table 1 - Hazard classes identified on Table 1 are required to be placarded whenever any quantity is transported. While contract haulers normally have the placards for the transport vehicle, the RLC OILFIELD SERVICES, LLC must ensure the correct placard is used.

1.3.4.2.2 Table 2 - Hazard classes identified on Table 2 are exempted from placarding requirements when less than 454 kg (1,001 pounds) aggregate gross weight of hazardous material are being transported.

1.3.4.3 Dangerous placard. When a transport vehicle (et.al.) contains non-bulk packages with two or more different hazard categories of materials that would otherwise require different placards specified in Table 2, the "Dangerous" placard may be applied instead of the hazard-specific placards. If any hazard class category exceeds 1,000 kg (2,205 pounds) aggregate gross weight (loaded at one facility), then the individual placard for the hazard category must be applied.

1.3.4.4 Exception for less than 454 kg (1,001 pounds). When non-bulk packages that contain less than 454 kg (1,001 pounds) aggregate gross weight of HM covered in Table 2 are transported by highway, no placard is required.

1.3.4.5 Hazardous material placards must be displayed on each end and each side of a motor vehicle or other transport vehicle and be readily visible.

1.3.4.6 Placarding requirements may vary according to the mode of transport (highway, rail, water, air) and the type of transport vehicle or container.

1.3.4.7 Hazardous materials that possess a subsidiary hazard as described in 49 CFR 172.505 must apply additional placarding to the vehicle.

1.3.4.8 Placarding exceptions are specified in 49 CFR 172.504(d) (f).

Table 1. Placarding Requirements by Category	
Category of material (Hazard class or division number and additional description, as appropriate)	Placard name
1.1	EXPLOSIVES 1.1
1.2	EXPLOSIVES 1.2
1.3	EXPLOSIVES 1.3
2.3	POISON GAS
4.3	DANGEROUS WHEN WET
5.2 (Organic peroxide, Type B, liquid or solid, temperature controlled)	ORGANIC PEROXIDE
6.1 (inhalation hazard. Zone A or B)	POISON INHALATION HAZARD

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7 (Radioactive Yellow III label only)	RADIOACTIVE ¹
Table 2. Placarding Requirements by Category	
Category of material (Hazard class or division number and additional description, as appropriate)	Placard name
1.4	EXPLOSIVES 1.4
1.5	EXPLOSIVES 1.5

¹ RADIOACTIVE placard also required for exclusive use shipments of low specific activity material and surface contaminated objects transported in accordance with §173.427(a) of this sub chapter.

1.6	EXPLOSIVES 1.6
2.1	FLAMMABLE GAS
2.2	NON-FLAMMABLE GAS
3	FLAMMABLE
Combustible liquid	COMBUSTIBLE
4.1	FLAMMABLE SOLID
4.2	SPONTANEOUSLY COMBUSTIBLE
5.1	OXIDIZER
5.2 (Other than organic peroxide, Type B, liquid or solid, temperature controlled)	ORGANIC PEROXIDE
6.1 (inhalation hazard, Zone A or B)	POISON
6.2	(None)
8	CORROSIVE
9	CLASS 9 [SEE §172.504(f)(9)]
ORM-D	(None)

1.4 Transportation of Hazardous Waste

The EPA mandates the requirements for generators of hazardous waste in 40 CFR 262. When a generator transports or offers for transportation a hazardous waste, the EPA specifies a number of requirements to be fulfilled in order to ensure appropriate management and protection of health, safety and the environment.

1.4.2 Hazardous Waste Manifest

The key to the RCRA Hazardous Waste Management Program is the use of the manifest. This document is designed to record the movement of hazardous waste from the generator through the transporter(s) and any intermediate storage sites, to the site where it is to be treated or disposed.

1.4.2.1 General Requirements

The manifest must be prepared by the generator prior to transporting the waste off-site. Since the generator must designate on the manifest the permitted facility to which the waste is to be delivered, prior contact with the treatment, storage, and disposal facility (TSDF) will be required in most cases. The generator can also specify an alternate TSDF to which the transporter can deliver the waste in case of an emergency.

If, for some reason, the transporter is unable to deliver the hazardous waste to either the

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designated or alternate facility, the transporter must contact the generator. The generator, in turn, must either designate another facility or instruct the transporter to return the waste.

Under this system, the transporter can only deliver the waste where the generator has instructed.

1.4.2.2 Information Required on the Manifest

Due to an overhaul of the manifest program (40 CFR 262.23 and 40 CFR 262 Appendix) which occurred on September 5, 2006 (40 CFR 262- 263) the manifest has been standardized and all State-modified manifests have been eliminated.

The EPA specifies that the manifest contain the following information:

- 1.4.2.2.1 A manifest document number preprinted by the printer.
- 1.4.2.2.2 The name, address, telephone number, and EPA or State identification number of the generator.
- 1.4.2.2.3 The Emergency Response phone number for the generator - only if one number is applicable to the entire shipment. If different for specific materials, the number is entered after each DOT description.
- 1.4.2.2.4 The name and EPA identification number of each transporter. If more than two, use the Manifest Continuation Sheet to document.
- 1.4.2.2.5 The name, address, and EPA identification number of the designated TSDF and the alternate, if any.
- 1.4.2.2.6 The DOT description (including proper shipping name, hazard class or division, identification number and packing group) as per 49 CFR 172.
- 1.4.2.2.7 The number and type of containers for each waste.
- 1.4.2.2.8 The total quantity of waste with units indicated.
- 1.4.2.2.9 The waste code or codes applicable to the waste.
- 1.4.2.2.10 The signature of the Generator/Offeror to certify that the shipment is properly prepared and in proper condition for transport. In addition, the generator is certifying the waste minimization certification.

The generator's certification is found in 40 CFR 262.27 and reads:

"I am a large quantity generator. I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment"

OR,

"I am a small quantity generator. I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford."

By signing this document, generators of over 1,000 kg/month affirm that they have a program of waste minimization in place. Generators of between 100 and 1,000 kg/month merely affirm that they have made a "good faith effort" to minimize their waste

generation. The EPA clarified this "good faith effort" to mean that these generators need only "consider" the waste minimization options available to them.

Although small quantity and very small quantity generators are not legally bound by this statement, when signing the manifest, best management practices require they also comply with these conditions.

When a party other than the generator prepares the shipment for transportation, this party may also sign the shipper's certification statement as the offeror of the shipment.

The words "On behalf of" in the signature block (handwritten or preprinted) indicate that the individual signs as the employee or agent of the named principal.

1.4.2.3 Obtaining the Manifest.

To ensure standardization and consistency of the printed manifest, the EPA has established a "*Manifest Registry*" to provide oversight for the document.

Anyone (i.e., businesses, individuals, or agencies) wishing to print the manifest must secure EPA approval. Registrants submitting an application and form samples for EPA evaluation must obtain EPA approval prior to distribution and/or use.

A generator must obtain and use a manifest that has been procured from an approved, registered printer.

A table of "*Approved Registered Printers for the Manifest*" can be found at <http://www.epa.gov/epawaste/hazard/transportation/manifest/registry/printers.htm>

1.4.2.4 Number of Copies

The manifest is designed to provide enough copies so that the generator, each transporter, and the TSDF will each have one copy with an additional copy to be returned to the generator by the TSDF. This usually means at least a 4-part form is required. If more than one transporter is used, the number of copies must increase accordingly.

Some State agencies also require copies of the manifest - potentially two copies for the generator's State agency and the disposer's State agency.

1.4.2.5 Use of the Manifest

During its use, the uniform manifest must accompany the waste shipment from the generator, through each transporter to the designated TSDF.

The generator:

- 1.4.2.5.1 Signs the manifest
- 1.4.2.5.2 Has the transporter sign and date upon pickup of the hazardous waste
- 1.4.2.5.3 Removes one copy for his records
- 1.4.2.5.4 Gives the remaining copies to the next transporter or the designated facility.
- 1.4.2.5.5 When the signed copy is returned by the designated facility, it can be added with or replace the original copy signed only by the generator and transporter.

The transporter will then:

- 1) Have either the next transporter or the designated facility (whichever is applicable) sign and date the manifest upon receipt of the waste shipment

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- 2) Retain a copy for his or her records
- 3) Give the remaining copies to the next transporter or the designated facility.

The designated facility will:

- 1) Retain a copy of the manifest for its records
- 2) Return a copy of the completed, signed manifest to the generator to acknowledge receipt of the shipment.

1.4.2.6 Pre-Transport Requirements

Before a shipment of hazardous waste is transported off-site, the EPA requires the generator to comply with the DOT regulations regarding packaging, labeling, marking and placarding (as specified in 3.7 - Transportation of Hazardous Materials).

- 1.4.2.6.1 Packaging - all packaging used for off-site shipment of hazardous wastes must conform to the DOT regulations found in 49 CFR 173, 178 and 179.
- 1.4.2.6.2 Labeling - each package of hazardous waste must be labeled in accordance with DOT regulations for hazardous materials under 49 CFR 172 (i.e. flammable gas, oxidizer, corrosive material, etc.).
- 1.4.2.6.3 Marking - each package of hazardous waste must be marked in accordance with the DOT regulations for hazardous materials under 40 CFR 172. At a minimum, the proper DOT shipping name (which includes the hazard class and UN/NA number) must be clearly marked on each container. In addition, the EPA requires that each container under 119-gallons in capacity must have the EPA-mandated marking that says:

HAZARDOUS WASTE

Federal Law Prohibits Improper Disposal. If Found,

Contact the nearest police or public safety authority

Or the U.S. Environmental Protection Agency.

Generator's Name and Address _ _ _ _ _

Generator's EPA Identification Number _ _ _ _ _

Manifest Tracking Number _ _ _ _ _

NOTE: Within the DOT system, this is not a "label." It is a "marking." Several companies supply adhesive-backed EPA Hazardous Waste markings which usually contain spaces for additional information that is not required by the EPA

- 1.4.2.6.4 Placarding - prior to transporting hazardous waste or offering hazardous waste for transportation off-site, a generator must placard or offer the initial transporter the appropriate DOT placard.

1.5 Emergency Response Communication Standards

In an effort to improve the communication of emergency response information for hazardous materials transported in commerce, the DOT requires that certain information be provided and maintained by the shipper.

a. Emergency Response Information (49 CFR 172.602)

Emergency response information that can be used in the mitigation of an incident involving hazardous materials must be maintained by carriers and facility operators who receive, store or handle hazardous materials during transportation.

At a minimum, the information must include the DOT description of the hazardous material, information on immediate hazards to health, risks of fire or explosion, immediate precautions and methods for handling spills, leaks or fires and preliminary first aid measures.

Facilities must maintain the information whenever the hazardous material is present and the information must be immediately accessible to personnel and available for use away from the package containing the material.

The information may be presented on the shipping paper or referenced to another document that contains the required information (i.e. the Emergency Response Guidebook); aboard aircraft, the International Civil Aviation Organization (ICAO) "Emergency Response Guidance for Aircraft Incidents Involving Dangerous Goods" and aboard vessels, the International Maritime Organization (IMO) "Emergency Procedures for Ships Carrying Dangerous Cargo").

If the DOT Emergency Response Guidebook (ERG) is used as reference for the required information, use of the initials "ERG" followed by the appropriately assigned guidance number can be used to cross-reference the required information. The cross-reference citation should be placed in conjunction with the material it applies to.

b. Telephone Contact for Emergency Response Information (49 CFR 172.604)

A 24-hour emergency response telephone number is required on most shipping documents describing hazardous materials. Only "limited quantities" and specific commodities are exempt from this requirement. The telephone number must either contact a person knowledgeable of the hazards, characteristics, and mitigation information of the shipped commodity or one who has immediate access to someone who does.

The emergency telephone number is to be accessible on a 24-hour basis. The number is to be placed on the shipping paper, immediately following the description. If designated by the person offering the shipment, the telephone number may be to another organization that has accepted responsibility for providing the detailed information.

1.6 Hazmat Employee Training

Each "hazmat employer" is required to train "hazmat employees" (e.g., RLC OILFIELD SERVICES, LLC Environmental Focal Point and others) regarding safe loading, unloading, handling, storing and transporting of hazardous materials as well as emergency procedures for responding to accidents/incidents involving the transportation of hazardous materials. The purpose of the DOT requirements in 49 CFR 172.700 is to increase a hazmat employee's awareness of safety considerations and regulatory requirements in order to reduce the occurrence of hazardous material incidents caused by human error.

To achieve this goal, there are four training requirements that apply to all modes of transportation. The four requirements are:

- a. General Awareness/Familiarization Training (i.e. HM regulations, hazard recognition)
- b. Function-Specific Training (i.e. skills, knowledge to perform job related to DOT-specified requirements or ICAO Technical instruction or IMDG-Code as applicable)
- c. Safety Training (i.e. material hazards, personal protection, handling procedures, remedial actions)
- d. Security Awareness Training (i.e. for those who affect transportation safety - an awareness of security risks associated with hazmat transport).

Section 16.6 provides details on what is required by each of these requirements.

The employer must certify that each employee received training and was tested on appropriate areas of responsibility. New employees and those who change job functions must receive training within 90-days of employment or after changing jobs. Recurrent training is required at least once every three years. A training record must be kept during the employment term plus 90-days after for each employee who completes the training.

R L C Oilfield Services, LLC

PROGRESSIVE DISCIPLINE POLICY FOR HOURS OF SERVICE VIOLATIONS

It is the responsibility of each driver / contractor working for R L C Oilfield Services, LLC to be familiar with the rules governing recordkeeping of their hours of service. All drivers are expected to keep their logs current to the most recent change of duty status and to log their time in a true and correct manner, consistent with the HOS rules set forth in 49 CFR, Part 395.

Our policy regarding discipline as a result of repetitive HOS violations is as follows:

Major violations of HOS rules will be reviewed on a monthly basis. For the purpose of exacting disciplinary action under this policy, the total review period will be a sliding six month period (most recent review month and the five months previous to that month). If a driver has three (3) or more of the same of any of the major violations listed below, the appropriate disciplinary action described in the table below will be taken.

Major violations

- Failure to surrender logs for each day of the month (including off-duty days)
- Non-inclusion (dropping) offloads
- Falsified log entries (fuel receipts, etc. not matching log entries)
- Violation of 11-hour rule
- Violation of 14-hour rule
- Violation of 70 hour in 8 day rule

Disciplinary action to be taken

Within a sliding six month period:

1st occurrence of three (3) or more of the same major violation within a single month will result in driver receiving notice of the violations in writing.

2nd occurrence of three (3) or more of the same major violation within a single month will result in driver receiving a written notice of the violations and being required to attend a video class on proper logging procedures.

3rd occurrence of three (3) or more of the same major violation within a single month will result in driver receiving a written notice of violations, a verbal counseling session with the safety department, and being required to attend a video class on proper logging procedures.

4th occurrence of three (3) or more of the same major violation within a single month will result in driver receiving notice of the violations, a written warning stating that the driver's eligibility for dispatch will be suspended in the event of another occurrence within the sliding six month period, and the driver being required to attend a video class on proper logging procedures.

5th occurrence of three (3) or more of the same major violation within a single month will result in driver receiving notice of the violations, the driver's eligibility for dispatch being suspended for one week and the driver receiving a written warning stating that a sixth occurrence within the sliding six month period will result in termination.

6th occurrence of three (3) or more of the same major violation within a single month will result in the driver being terminated without eligibility for rehire.

I have received and understand this policy and its potential effect on my eligibility for dispatch, lease agreement, or employment.

Driver's signature

Date

Witness - Company representative

R L C Oilfield Services, LLC

Vehicle Inspection & Maintenance Policy

R L C Oilfield Services, LLC, herein after referred to as "Company", is committed to the safe operation and maintenance support of our commercial motor vehicle fleet. The purpose of this policy is to define the procedures by which we will ensure our safe operations of commercial motor vehicles, to define the individuals responsible for each aspect of the policy and to comply with the Federal Motor Carrier Safety Regulations (49 CFR Part 396).

Company will provide safe and reliable vehicles which are mechanically sound and are regularly inspected and maintained.

Company officials who are responsible for safety will either maintain or cause to be maintained all records pertaining to maintenance, repair, and inspection of all commercial motor vehicles, and will maintain these records for the period of time required to be in compliance with 49 CFR Part 396.

Designated maintenance personnel are responsible for keeping or causing contract maintenance providers to keep vehicles or other equipment functioning properly through preventive maintenance or regular service, repair, and inspection. Maintenance personnel are also responsible for ensuring or causing contract maintenance providers to ensure that all safety related repairs are made as indicated on vehicle inspection reports and to provide the required documentation for all service and repairs.

Drivers are responsible for proper and safe operation of vehicles, reporting of any problems or defects with any vehicles in a timely manner, and not to operate any vehicle if it is likely to breakdown or cause an accident due to mechanical deficiency. Drivers are also responsible to conduct proper pre- and post-trip vehicle inspections prior to operating, and immediately following the operation of a vehicle, with post-trip inspections being documented on a daily vehicle inspection report and turn this report in to designated maintenance personnel in a timely manner. The vehicle inspection process will cover the following components of the equipment:

Drive line	Tires, wheels, rims	Suspension system	Body
Glass	Fuel system	Cooling system	Engine
Leaks	Exhaust	Frame	Headlights
Tail lights	Stop & turn lights	Clearance markers & lights	Reflectors
Speedometer	Oil pressure	Ammeter	Clutch
Horn(s)	Windshield wiper	Parking brakes	Service brakes
Transmission	Rear vision mirrors	Steering	Speedometer
Low air pressure warning device			

Emergency equipment

Reflective triangles	Fire extinguisher
Flags	Spare bulbs / fuses

Contract maintenance personnel are responsible to provide Company with all required documentation related to the maintenance functions and the qualifications of individuals performing those functions.

Company will ensure that all commercial motor vehicles are inspected annually in accordance with the requirements 49 CFR Part 396 regarding FHWA annual vehicle inspections. Record of these inspections shall be maintained in the Company's permanent equipment maintenance files and the FHWA annual inspection sticker shall be attached to the side of each vehicle.

Company will perform or cause a contract maintenance provider to perform regularly scheduled preventative maintenance on all commercial motor vehicles to ensure continued safe operating condition of these vehicles.

Company will ensure that mechanics assigned to perform work on brake systems on Company's units that are equipped with air-brakes are qualified in compliance with 49 CFR Part 396.25 (d).

I hereby acknowledge that I have read and understand this policy and that I fully understand my responsibilities under this policy.

Driver's signature

Date

**TRANSPORTATION OF NON-HAZARDOUS OILFIELD
WASTE AND NON-HAZARDOUS INDUSTRIAL
SOLID WASTE**

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Synopsis

The purpose of this section is to provide information regarding the application of the Department of Transportation (DOT) regulations to Non-Hazardous materials transported by RLC OILFIELD SERVICES, LLC personnel. The section applies to all RLC OILFIELD SERVICES, LLC facilities, work sites and employees. Non-Hazardous oilfield waste and industrial solid waste is defined as unwanted substances or mixture of substances that result from the construction, operation or reclamation of a well site, oil and gas battery, gas plant, compressor station, crude oil terminal, pipeline, or related facility.

Initial Implementation Requirements:

- Appoint a Designated Person to coordinate Non-Hazardous material transportation.
- Identify Scope of Applicability at Site/Facility Operations with the Requirements of this Section
 - ▶ Identify all Non-Hazardous materials transported by RLC OILFIELD SERVICES, LLC employees.
 - ▶ Identify all Non-Hazardous materials and wastes transported by a contracted service provider.
 - ▶ Prepare a "short list" of site-specific Non-Hazardous material and Non-Hazardous waste shipping descriptions.

Recurring and Annual Task Requirements:

- Identify and Verify Shipping Descriptions, Labeling and Marking to be used on Containers and Shipping Documents during Length of Contract.
- Train Affected Personnel in Their Role of Ensuring Compliance with DOT and EPA Transportation Requirements
- Inspect Labeling, Marking and Paperwork prior to Signing Shipping Document and Releasing Non-Hazardous Materials/Non-Hazardous Waste for Transportation
- Ensure Signed Copy of Non-Hazardous Waste Manifest is Returned From the Treatment, Storage and Disposal Facility (TSDF) Within 45-Days

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Transportation of Non-Hazardous Materials and Waste Checklist	YES	NO	NA
1. Has the work site identified all the Non-Hazardous materials regulated by the U.S. Department of Transportation (DOT) that are transported by RLC OILFIELD SERVICES, LLC employees?	-	-	-
2. Have all RLC OILFIELD SERVICES, LLC employees who transport these Non-Hazardous materials received instruction on proper labeling and marking as well as methods to secure these materials during transport?	-	-	-
3. Have all DOT Non-Hazardous materials that are transported from the facility or work site by a contracted hauler been identified?	-	-	-
4. Has a listing been prepared for each DOT Non-Hazardous material identifying the material, its proper shipping name, the appropriate markings, and allowable shipping containers to be used?	-	-	-

TRANSPORTATION OF NON-HAZARDOUS MATERIALS AND WASTE

1.1 Purpose and Scope

RLC OILFIELD SERVICES, LLC personnel provides specific guidance for transportation of Non-Hazardous materials and waste.

1.2 Definitions

Labeling	The application of non-hazard warning labels are in accordance with DOT.
Marking	The descriptive name, instructions and cautions include the proper shipping name, the identification number, other regulated material (ORM) designations, internal packaging, and specific requirements for various types of tanks.
Operating Unit	RLC OILFILED SERVICES, LLC

1.3 Transportation of Non-Hazardous Materials and Waste

1.3.2 Shipping Papers

Anyone who offers a Non-Hazardous material for transportation is will describe the material on a shipping paper. This document accompanies the shipment to its destination and serves as a record of the shipment, the transporter used and final disposition of the Non-Hazardous materials shipped from RLC OILFIELD SERVICES, LLC facilities and work locations.

1.3.2.1 General Entries

While non-regulated items may be included on the same shipping paper as regulated Non-Hazardous materials, the Non-Hazardous material entries will be identified.

1.3.2.1.1 All copies of shipping papers must be legible and printed (mechanically or manually) in English.

1.3.2.1.2 Unless allowed, no abbreviations may be used in the description.

1.3.2.1.3 Additional information about the material may be added, but it must be placed after the "basic description."

1.3.2.1.4 If more than one sheet is necessary, ensure that it is sequentially numbered indicating the number of pages (i.e., 1 of 4 pages).

1.3.2.2 Emergency Response Telephone Number

A 24-hour emergency response telephone number for use in the event of an emergency involving the shipped Non-Hazardous material must be provided on the shipping paper. The number must have immediate access to a person who is knowledgeable of the material and emergency response mitigation information for the material.

1.3.3 Non-Hazardous Waste Manifest

Non-Hazardous Waste Management Program use of the manifest. This document is designed to record the movement of Non-Hazardous waste from the generator through the transporter(s) and any intermediate storage sites, to the site where it is to be treated or disposed.

1.3.3.1 General Requirements

The manifest must be prepared by the generator prior to transporting the waste off-site. Since the generator must designate on the manifest the permitted facility to which the waste is to be delivered, prior contact with the treatment, storage, and disposal facility (TSDF) will be required in most cases. The generator can also specify an alternate TSDF to which the transporter can deliver the waste in case of an emergency.

If, for some reason, the transporter is unable to deliver the Non-Hazardous waste to either the designated or alternate facility, the transporter must contact the generator. The generator, in turn, must either designate another facility or instruct the transporter to return the waste.

Under this system, the transporter can only deliver the waste where the generator has instructed.

1.3.3.2 Information Required on the Manifest

- 1.3.3.2.1 A manifest document number preprinted by the printer.
- 1.3.3.2.2 The name, address, telephone number, and EPA or State identification number of the generator.
- 1.3.3.2.3 The Emergency Response phone number for the generator - only if one number is applicable to the entire shipment. If different for specific materials, the number is entered after each DOT description.
- 1.3.3.2.4 The name of each transporter.
- 1.3.3.2.5 The name, address, and EPA identification number of the designated TSDF and the alternate, if any.
- 1.3.3.2.6 The DOT description
- 1.3.3.2.7 The number for each waste.
- 1.3.3.2.8 The total quantity of waste with units indicated.
- 1.3.3.2.9 The waste code or codes applicable to the waste.
- 1.3.3.2.10 The signature of the Generator/Offeror to certify that the shipment is properly prepared and in proper condition for transport.

1.3.3.3 Number of Copies

The manifest is designed to provide enough copies so that the generator, each transporter, and the TSDF will each have one copy with an additional copy to be returned to the generator by the TSDF. This usually means at least a 4-part form is required. If more than one transporter is used, the number of copies must increase accordingly.

Some State agencies also require copies of the manifest - potentially two copies for the generator's State agency and the disposer's State agency.

1.3.3.4 Use of the Manifest

During its use, the uniform manifest must accompany the waste shipment from the generator, through each transporter to the designated TSDF.

The generator:

- 1.3.3.4.1 Signs the manifest
- 1.3.3.4.2 Has the transporter sign and date upon pickup of the Non-Hazardous waste
- 1.3.3.4.3 Removes one copy for his records
- 1.3.3.4.4 Gives the remaining copies to the next transporter or the designated facility.
- 1.3.3.4.5 When the signed copy is returned by the designated facility, it can be added with or replace the original copy signed only by the generator and transporter.

The transporter will then:

- 1) Have either the next transporter or the designated facility (whichever is applicable) sign and date the manifest upon receipt of the waste shipment

- 2) Retain a copy for his or her records
- 3) Give the remaining copies to the next transporter or the designated facility.

The designated facility will:

- 1) Retain a copy of the manifest for its records
- 2) Return a copy of the completed, signed manifest to the generator to acknowledge receipt of the shipment.

1.4 Emergency Response Communication Standards

In an effort to improve the communication of emergency response information for Non-Hazardous materials transported in commerce, the DOT requires that certain information be provided and maintained by the shipper.

a. Emergency Response Information

Emergency response information that can be used in the mitigation of an incident involving Non-Hazardous materials must be maintained by carriers and facility operators who receive, store or handle Non-Hazardous materials during transportation.

At a minimum, the information must include the DOT description of the Non-Hazardous material, information on immediate hazards to health, risks of fire or explosion, immediate precautions and methods for handling spills, leaks or fires and preliminary first aid measures.

Facilities must maintain the information whenever the Non-Hazardous material is present and the information must be immediately accessible to personnel and available for use away from the package containing the material.

The information may be presented on the shipping paper.

A 24-hour emergency response telephone number is required on most shipping documents describing Non-Hazardous materials. The telephone number must either contact a person knowledgeable of the hazards, characteristics, and mitigation information of the shipped commodity or one who has immediate access to someone who does.

The emergency telephone number is to be accessible on a 24-hour basis. The number is to be placed on the shipping paper, immediately following the description. If designated by the person offering the shipment, the telephone number may be to another organization that has accepted responsibility for providing the detailed information.

1.5 Non-Hazmat Employee Training

RLC OILFIELD SERVICES, LLC provides training regarding safe loading, unloading, handling, and transporting of Non-Hazardous materials as well as emergency procedures for responding to accidents/incidents involving the transportation of Non-Hazardous materials. The purpose of the RLC requirements is to increase a non-hazmat employee's awareness of safety considerations and regulatory requirements in order to reduce the occurrence of Non-Hazardous material incidents caused by human error.

To achieve this goal, we provide our employees with the training listed below.

Function-Specific Training (i.e. skills, knowledge to perform job related to DOT- specified requirements or ICAO Technical instruction or IMDG-Code as applicable)

- a. Backing Safety Training
- b. Decisive Driver Training
- c. Pre / Post Trip Inspection Training
- d. Tanker Rollover Prevention Training

R L C OILFIELD SERVICES, LLC SAFETY POLICY

R L C OILFIELD SERVICES is committed to providing the best, safest working conditions possible for its employees. It is also dedicated to discovering, correcting, and preventing safety and environmental health hazards that could affect employees and the public. To accomplish this, **R L C OILFIELD SERVICES** will comply with all current occupational health, safety, and environmental laws and develop the best feasible operations, procedures, technologies, and policies to provide such conditions and will base its practices on the principle of least acceptable risk as defined and accepted by the public. **R L C OILFIELD SERVICES** recognizes its duties under various state and federal environmental health laws and shall try to prevent the development or continuation of harmful environmental conditions resulting from company operations.

HEALTH AND SAFETY-The best source of protection for the health and safety of the work force is the individual employee. The company therefore requires employees to follow all health and safety policies/procedures and establishes comprehensive and realistic policies based on experience and current scientific research to prevent unreasonable health and safety risks. **R L C OILFIELD SERVICES** requires its employees to report immediately any unsafe or hazardous working condition. Any input as to corrective action is encouraged. Supervisors and managers will immediately take steps to correct such conditions.

R L C OILFIELD SERVICES maintains that occupational health and safety policies must be balanced by an appreciation of economic and technological constraints and does not believe that it is practical or even Possible to eliminate every health or safety risk in the workplace.

R L C OILFIELD SERVICES will provide safe and healthful working conditions in all its facilities and will keep all employees constantly aware of required safety and health procedures. It is our belief that the key to success in a safety and health program is the individual employee. It is a condition of employment that each employee conducts their work in a safe and healthful manner.

Company Property- Every employee is responsible for the safe operation of company equipment, tools, machinery, vehicles, or other company property in their charge. **R L C OILFIELD SERVICES** will provide for proper care and maintenance of company property. Employees should realize that regular maintenance is essential to the safe use and long-term operation. In cases of serious malfunction where employees are endangered, or company operations threatened, employees are not required to jeopardize their personal safety, but should immediately warn fellow employees, supervisors, and anyone else affected by the situation.

R L C OILFIELD SERVICES strives to reduce safety issues by providing the best possible working conditions and comply with applicable laws of each state where **R L C OILFIELD SERVICES** has facilities.

R L C Oilfield Services, LLC

SECURITY PLAN FOR THE TRANSPORTATION OF HAZARDOUS MATERIALS

Statement of Purpose:

R L C Oilfield Services, LLC ("Company") is committed to the safety and security of our employees, our customers, and the general public. Since the September 11, 2001 terrorist attacks, it has been necessary for everyone, including the Company and our employees, to be more vigilant in preventing or inhibiting the use of our products, transportation equipment, and facilities by international and domestic terrorists and by those who might collude with such terrorists. All of the Company's employees are asked to help implement this security plan and improve continuously the Company's security efforts.

The U.S. Department of Transportation's Research and Special Programs Administration has promulgated regulations (known as "HM-232") that, in part, require that any employee of this Company (including independent contractors) who is a "hazmat employee" be trained and be familiar with the Company's security plan. Our understanding of these regulations is that a "hazmat employee" is any person who performs a task or function covered by the Federal Hazardous Materials Regulations ("HMRs").

Security Risk Assessment

The Company has collected, reviewed and integrated information about potential security risks as part of its attempt to understand site-specific and route-sensitive risks to security. The facilities that are at highest security risk are those where we have bulk fuel storage tanks. The vehicles that are at highest security risk are those bulk fuel transport tanks utilized to transport diesel fuel between storage tanks and worksites.

Personnel Security

The Company will implement the following provisions with regard to the employment (including applications for employment) of hazmat drivers. Further, the Company, at its discretion, may implement some or all of these provisions relevant to the employment of non-driver employees who perform functions regulated by the Federal HMRs.

1. Perform detailed background checks on all applicants for any driver position.
2. To the extent possible, check for criminal convictions.
3. Contact previous employers and references.
4. Investigate gaps in employment.
5. To the extent possible, have at least 10 years consecutive employment/education records.

6. Maintain employee information in a confidential and secure manner, and in compliance with all relevant Federal and State regulations and statutes regarding confidentiality and individual privacy.
7. Verify that drivers are U.S. citizens or that non-citizens have documentation appropriate to their immigration status.
8. Ensure drivers have current CDL with appropriate endorsements and another form of identification (*e.g.*, company-issued credential or current medical certificate.)
9. Collect company identification card and any security materials when a driver/employee leaves the Company.
10. Update Company websites and lists, as well as cancel passwords to prohibit computer access by former employees.

Unauthorized Access

1. The Company will designate who is in charge of security for the Company at each of its facilities where hazardous materials are stored.
2. The Company will conduct security awareness training for all employees, including how to report suspicious incidents or events.
3. The Company will require all visitors and outside vendors to a Company facility to sign in and/or be given a visitor's badge.
4. Designated personnel will perform daily checks and equipment reconciliations.
5. All personnel will remove keys from trucks and truck tractors not in use and have secure key storage.
6. All employees should control access to computers, especially those with product or routing information.
7. The Company may request periodic checks of facility areas by local law enforcement, especially when facility is not open. The Company may develop specific actions for each security level alert that might be set by the Department of Homeland Security ("DHS").
8. The Company will post the DHS threat level in drivers' room and other public areas.
9. The Company will post and periodically review driver anti-terrorism tips.
10. All employees should be aware of possible points of unauthorized access to Company facilities or buildings.
11. The Company may periodically test emergency response communications equipment and procedures.

En Route Security

1. STAY ALERT!
2. Drivers should lock truck or truck tractor doors at all times and take keys any time the driver is not with vehicle. Ensure windows are closed.
3. Drivers should perform "walk around" inspection of vehicles after every stop, including deliveries and breaks.

4. The Company will develop "parking instructions" for any locations away from Company facilities. Look for lighted and fenced areas, visibility, and security.
5. The Company will attempt to include security considerations in route selection and times for pick up and delivery.
6. Driver "down-time" should be minimized while en route. Schedule as few stops as possible.
7. The Company will establish procedures to communicate emergency messages to all facilities and to drivers on the road. The Company will include communications procedures for drivers to report any unexpected occurrence with equipment, load, or route.
8. Drivers (and other knowledgeable employees) should not discuss any details about their load or pick-up points and destinations with unauthorized personnel, such as over the CB radio or at truck stops.
9. Drivers should not pick up hitchhikers or allow any unauthorized personnel in the truck cab.
10. Drivers should not stop to help disabled vehicles or motorists. Call local authorities and notify them of anyone needing assistance. Be suspicious of motorists trying to get the driver to pull over for an "alleged" traffic accident. Be especially suspicious of vehicles with three or more people in them.
11. The Company will develop a procedure for detecting "late loads." The Company will investigate any late load more than an hour late for a delivery.
12. Drivers should not change delivery destination unless authorized.
13. The Company will develop a procedure for drivers when being asked to pull over by law enforcement or unmarked vehicles.
14. All employees are to report any suspicious events to the Company and local law enforcement.
15. If there is an emergency situation, contact 911 or 311 immediately.
16. Don't allow yourself to be distracted by others during the loading/unloading.
17. Review the FMCSR pocketbook regarding attendance and surveillance of motor vehicles.

Reporting Threats and Incidents

The following information would be helpful to note when reporting any threats or incidents:

- Description of the vehicle(s): Please describe all observables about the truck-size, color, markings, as well as license, registration, and other pertinent identifying information.
- Description of the truck's contents: What is the truck carrying, and in what quantity?
- Description of the event or observation:
 - o When did the event occur?
 - o Where did the event occur?
 - o What direction did the truck head?
 - o Describe the individual(s) operating the vehicle?
 - o Did the individual(s) involved in the event say anything about what they were doing or where they intended to go?
 - o Additional suspects involved, i.e. supporting surveillance vehicle.

General Security Awareness

- Any employee or visitor making unusual or repeated requests for sensitive or important Company-related information.
- Any person asking a driver to make any unauthorized movement (pick-up and delivery) for cash.
- Any person or group loitering outside the Company facility.
- Any person claiming to be a representative of a utility (gas, water, electric) but cannot produce company identification.
- Any person carrying a weapon, such as a gun or knife.
- After hours, any vehicle driving by the Company facility with the lights off.
- Any occupied vehicle parked outside the Company facility - especially if the vehicle has been sitting for a long period or after normal work hours.
- Any unfamiliar vehicle that appears to be abandoned near the Company facility.

R L C Oilfield Services, LLC
1815 LINE AVE
SHREVEPORT, LA 71101

POLICY STATEMENT

R L C Oilfield Services, LLC (Company) recognizes that our employees are our greatest asset. Our employees are the key to reaching our goal of providing the best products and services to our customers. To achieve our goal, and to maximize the skills and talents of our employees, it is important that every employee of our company understands the dangers of drug and alcohol abuse and be aware of the most recent state and federal requirements concerning substance abuse. This Policy and Procedure guide should not be construed as contractual in any nature.

POLICY OBJECTIVES

1. To create and maintain a safe, drug-free working environment for all employees.
2. To encourage any employee with a dependence on, or addiction to, alcohol or other drugs to seek help in overcoming the problem.
3. To reduce problems of absenteeism, tardiness, carelessness and/or other unsatisfactory matters related to job performance.
4. To reduce the likelihood of incidents or accidental personal injury and/or damage to customers, visitors or property.
5. To meet the requirements of the federal DOT Workplace Drug Testing Programs found in 49 C.F.R. Part 40, as amended, and the Federal Motor Carriers Safety Administration (FMCSA) found in 49 C.F.R. Part 382.
6. To minimize the likelihood that company property will be used for illicit drug activities.
7. To protect the reputation of the company and its employees within the community.

Substance abuse can be a serious threat to the company, its employees and customers. Though the percentage of substance abusing employees may be relatively small, practical experience and research indicate that appropriate precautions by the company are necessary. It is the belief of the Company that the benefits derived from the policy objectives outweigh the potential inconvenience to employees. The Company earnestly solicits the understanding and cooperation of all of its employees in the implementation and enforcement of this policy.

PROHIBITIONS

The Company requires that all employees report to work without any alcohol or illegal mind-altering substances in their systems. Employees are also prohibited from using, possessing, manufacturing, distributing, or making arrangements to distribute unlawful drugs while at work, on Company property, during breaks, or in Company vehicles.

No employee shall report to work or remain on duty requiring the operation of a motor vehicle, other hazardous equipment or performing job duties in a hazardous environment when the employee is using any controlled substance, except when the use is pursuant to the instruction of a physician who has advised the employee that the substance does not adversely affect the employee's ability to perform in a safe manner. No employee shall use alcohol while on duty. No employee shall perform any job-related duties within four hours of using alcohol. Further, outside conduct of a substance-abuse related nature which affects the employee's work, the Company's relationship with government agencies or reflects poorly on the Company is prohibited.

Employees must inform their supervisor or the Company's DER when they are legitimately taking medication which may affect their ability to work in a safe manner in order to avoid creating safety problems and violating this Drug and Alcohol Policy. The law treats the abuse of prescription medication as unlawful drug use.

The Company's DER is **BARBARA ROCHA, DIRECTOR OF COMPLIANCE**

She may be reached at 2 25-485-2454

ENFORCEMENT

In order to enforce these rules, the Company reserves the right to require all employees (defined as all employees subject to the FMCSA regulations found in 49 C.F.R. Part 382, as well as, all other employees subject to testing under the authority of the Company) to submit, at any time an employee is on duty or at any time an employee may normally be called to be on duty, to drug tests to determine the presence of prohibited substances. The Company is also required to develop, implement and enforce a drug and alcohol policy for their driver-employees as a condition of compliance with the FMCSA regulations.

Pursuant to Company policy and regulations, applicant testing may be required. All current employees may be required to undergo testing at scheduled physical examinations, where the Company has reasonable suspicion to believe an employee has violated its Alcohol and Drug Policy, and on a random basis without advance notice. Employees are also required to report all injury or damage related accidents involving Company property or personnel or during

Company-related activities and may be required to submit to alcohol screening within eight (8) hours and to drug screening within thirty-two (32) hours of a reportable accident. Employees who return to work following rehabilitation will be required to undergo return to duty/follow-up testing in addition to the general Company testing requirements. Additionally, any employee absent from regular job activities and duties for a period greater than twenty-one (21) days will also be subject to return to duty testing. A report of a negative drug test result to the Company Designated Employer Representative by the MRO is a condition of reinstatement of the employee to a position of active employment.

Violation of these rules, including testing positive, will subject the employee to discipline, up to and including discharge. Pursuant to Company policy, the Company will presume that an employee with a breath alcohol concentration (BrAC) at or above .04 is "under the influence" of alcohol, and he/she will be immediately removed from duty and will be subject to discipline, up to and including immediate discharge. Refusal to cooperate with the Company in any test, investigation, search, or paperwork or consent form, will result in discipline, up to and including immediate discharge. Possession of, distribution of, or consumption of unlawful or abused drugs, unauthorized alcohol, or drug paraphernalia, or unlawful conduct on or off duty, will also result in discipline, up to and including immediate discharge.

All information, interviews, reports, statements, memoranda and test results, written or otherwise, received by the employer through its drug and alcohol testing program will be treated as confidential communications and may not be used or received in evidence, obtained in discovery, or disclosed in any public or private proceedings except in accordance with the Consent/Release Form, and whenever necessary for the Company to defend itself in any administrative or civil proceeding.

Any questions should be directed to the person assigned as the Company's Designated Employer Representative (DER). At the time of implementation of this policy, the DER is Rick Cleveland.

**R L C Oilfield Services,
LLC 1815 Line Ave
Shreveport La 71101**

**Drug and Alcohol Testing Policy
Procedures**

I. General Policy

Practical experience and research has proven that even small quantities of narcotics, abused prescription drugs or alcohol can impair judgment and reflexes. Even when not readily apparent, this impairment can have serious results, particularly for employees operating vehicles or potentially dangerous equipment. Drug-using employees are a threat to co-workers and themselves, and may make costly errors. For these reasons, R L C Oilfield Services, LLC has adopted a policy that all employees must report to work completely free from the effects of alcohol and/or the presence of drugs, unless used as prescribed by a physician.

II. Drug Use/ Distribution/ Impairment/ Possession

All employees are prohibited from using, possessing, distributing, manufacturing, or having controlled substances, abused prescription drugs, inhalants, or any other mind altering or intoxicating substances present in their system while at work or on duty.

III. Alcohol Use/ Possession/ Impairment

All employees are prohibited from possessing, drinking or being impaired or intoxicated by alcohol while at work or on duty. While employees are prohibited from having any alcohol present in their system while on duty, a Breath Alcohol Concentration (BrAC) of .04 will be accepted as presumptive evidence of intoxication. Additionally, mandated employees (employees subject to the provisions of 49 C.F.R. part 40 and the FMCSA regulations found in 49 C.F.R. Part 382) with a BrAC of .02-.039 will be placed out-of-service for a period of no less than 24 hours. Evidential breath testing devices (EBTs) on the National Highway Safety Administration Conforming Products List will normally be used to determine BrAC.

IV. Off-Duty Conduct

Off-the-job use of drugs, alcohol or any other prohibited substances, including inhalants, which results in impaired work performance, including, but not limited to, absenteeism, tardiness, poor work product, or harm to the Company's image or relationship with government is prohibited. Employees

should realize that these regulations prohibit all illicit drug use both on and off duty.

V. Prescription Drugs

The proper use of medication prescribed by a physician is not prohibited; however, the Company prohibits the misuse of prescribed (or over-the-counter) medications and requires all employees using drugs under the direction of a physician to notify their supervisor or the Company's DER prior to beginning work where these drugs may affect their job performance, such as by causing drowsiness.

The Company's DER is BARBARA ROCHA Director of Compliance
She may be reached at **225-485-2454**

VI. Substance Screening

A. Applicants (Pre-employment)

All successful candidates for employment as a driver must undergo testing for controlled substances as required by 49 C.F.R. Part 382 prior to being allowed to perform any safety sensitive functions. Any offer of employment as a driver is contingent upon successful passing of both the alcohol and controlled substances screens. Such testing may be required either alone or as part of a pre-employment physical examination. Applicants are required to sign a consent/release form before submitting to screening. Applicants will be disqualified for hire if they test positive for drugs or adulterants, refuse to submit to a test, or refuse to execute the required consent/release form.

B. All Current Employees (subject to the provisions of 49 C.F.R. part 40 and the FMCSA regulations found in 49 C.F.R. Part 382)

1. Reasonable Suspicion

All employees subject to the provisions of 49 C.F.R. part 40 and the FMCSA regulations found in 49 C.F.R. Part 382 may be required to submit to screening whenever a supervisor observes circumstances which provide reasonable suspicion to believe an employee has used alcohol or a controlled substance or has otherwise violated the substance abuse rules. The supervisor's opinion that reasonable suspicion exists to require the employee to undergo an alcohol and drug test must be based on specific, contemporaneous, articulable observations concerning the appearance, behavior, speech or body odors of the employee.

The required observations for alcohol and/or controlled substance reasonable suspicion testing shall be made by a supervisor or designee who has been

trained for at least 60 minutes on alcohol misuse and an additional 60 minutes on controlled substance misuse.

The supervisor or supervisors requesting testing shall prepare and sign written documents explaining the circumstances and evidence upon which they relied within 24 hours of the testing, or before the results of the tests are released, whichever is earlier. While one supervisor may request a reasonable suspicion test, when feasible, supervisors are encouraged to obtain a second supervisor as a witness.

Regardless of whether it is suspected that the employee is under the influence of alcohol or controlled substances, test for both alcohol and controlled substances shall be conducted.

2. Random Testing

The Company may conduct random unannounced drug screening of employees subject to the provisions of 49 C.F.R. part 40 and the FMCSA regulations found in 49 C.F.R. Part 382. The Company will produce computerized random lists for the purpose of selecting such employees in adequate annual quantities to be in compliance with 49 C.F.R. Part 382.305. The list of employees in the DOT random pool will be updated on a quarterly basis. Employees will be required to report to the Company's designated collection site for testing immediately following notification. There will be no maximum number of samples that any one individual may be required to provide.

All employees referenced above may be tested during the initial implementation of this program.

3. Post Accident Testing

Employees are required to immediately notify the Designated Employer Representative (DER) of any accident resulting in injury or damage to Company property. At the time of implementation of this policy, the DER is Barbara Rocha.

The Company will require DOT post accident drug and alcohol testing in accordance with all applicable state and/or federal regulations, and may require an employee involved in any accident resulting in injury requiring more than simple first aid or resulting in damage to property, to submit to drug and/or alcohol testing as a result of the occurrence of an accident. The Company will discipline any employee who fails to report an accident or submit to substance screening where required by law or this policy. The Designated Employer Representative shall complete an Accident Report in compliance with Company policy and applicable laws and regulations.

4. Return to Duty / Follow-up Testing

Any employee returning to duty after testing positive must have completed a recommended rehabilitation program. In accordance with the Omnibus Transportation Employee Testing Act of 1991, employees will be required to submit to a minimum of six (6) tests during the first year and follow-up testing can continue for up to five (5) years.

Additionally, any employee absent from regular job activities and duties for a period greater than twenty-one (21) days will also be subject to return to duty testing. A report of a negative drug test result to the Company Designated Employer Representative by the MRO is a condition of reinstatement of the employee to a position of active employment.

5. Recertification Physical Examinations

All employees may be required to undergo urinalysis as part of a recertification physical examination.

C. Testing Procedures

1. General Guidelines

The Company and its laboratory shall rely on the guidance of the Federal Department of Transportation, Procedures for Transportation Workplace Drug Testing Programs, 49 C.F.R. Parts 40.1 through 40.413, and on the further guidance of the FMCSA regulations provided in 49 C.F.R. Part 382.

2. Substances Testing for All Employees

Employees may regularly be tested for: Amphetamines, Cannabinoids, Cocaine, Opiates, Phencyclidine and Alcohol. Employees may be tested for other substances, including inhalants, without advance notice as part of a separate test performed by the Company for safety purposes. Such tests will be coordinated with the Designated Employer Representative.

3. Testing Procedure

The Company reserves the right to utilize any form of testing, including but not limited to, blood, hair, breath, saliva or urinalysis testing procedures. All initial positive urine and hair specimens will be confirmed by gas chromatography/ mass spectrometry (GC/MS). Only urinalysis drug testing will be utilized in the pre-employment and random testing. All initial positive alcohol breath testing and/or alcohol saliva testing will be confirmed on an

evidential breath testing device (EBT) approved by the National Highway Traffic Safety Administration (NHTSA) for the evidential testing of breath and placed on NHTSA's "Confirming Products List" (CPL) of evidential breath measurement devices.

D. Collection Site

The Company will designate collection site(s) where employees may provide specimens.

E. Collection Procedures

The Company and its contract alcohol and drug testing laboratory have developed and will maintain a documented procedure for collecting, shipping and accessing specimens. The Company and its contract drug and alcohol testing laboratory will utilize a standard Urine Custody and Control Form for all employee urine drug testing. The Company and its contract drug and alcohol testing laboratory will utilize a standard hair Custody and Control Form for all employee hair testing. The Company and its contract drug and alcohol testing laboratory will utilize a standard Breath Alcohol Testing Form for all employee alcohol testing. A tamper-proof sealing system, identifying numbers, labels, and sealed shipping containers will also be used for specimen transportation.

Collection site(s) will maintain instructions and training emphasizing the responsibility of the collection site personnel to protect the integrity of the specimen and maintain as proper a collection procedure as reasonable. Where the Company may have an employee perform the function of collecting specimens, the Company will provide instruction and training to that employee. All DOT drug screen collectors shall meet the training requirements of 49 C.F.R. Part 40, as amended. All alcohol testing will be performed by a certified Breath Alcohol Technician (BAT).

All employees will be required to execute the Company Applicant / Employee Consent Form.

F. Occasions when the collection personnel should directly observe the specimen being provided.

The Company has adopted the direct observation procedures as set out in Section 40.67 of the Department of Transportation regulations as amended. An employer or medical representative at the collection site may directly observe an employee provide the specimen where there is reason to believe that an individual may alter or substitute the specimen. Section 40.67 sets out the only circumstances where direct observation is appropriate.

- (1.)An employer MUST direct an immediate collection under direct observation with no advance notice to the employee if:
 - a. the laboratory reported to the MRO that a specimen is invalid, and the MRO reported to the employer that there was not an adequate medical explanation for the result.
 - b. the MRO reported to the employer that the original positive, adulterated or substituted test result had to be cancelled because the test of the split specimen could not be performed.
- (2.)An employer MAY direct a collection under direct observation of an employee if the drug test is a return-to-duty test or follow-up.
- (3.)A collector MUST immediately conduct a collection under direct supervision if:
 - a. the Designated Employer Representative directs the collector to do so;
 - b. the collector observes materials brought to the collection site or the employee's conduct clearly indicates an attempt to tamper with a specimen;
 - c. the temperature of the original specimen was out of range; or
 - d. the original specimen appeared to have been tampered with.

The collector or the employer must explain to the employee the reason for the direct observation.

Where necessary, a Company representative or medical personnel may obtain a specimen outside of a designated collection site (such as, at a public restroom at an accident investigation).

G. Evaluations and Return of Results to the Company

The laboratory will transmit (by fax, mail, or computer, but not orally over the telephone) the results of all tests to the Company's MRO. The MRO will be responsible for reviewing test results of employees and confirm that the individuals testing positive have used drugs, adulterated, or substituted the specimen in violation of the Company policy. Prior to making a final decision, the MRO shall give the individuals an opportunity to provide a medical explanation for the positive test result either face-to-face or over the telephone. Furthermore, the MRO shall give the individual the option of having his/her split specimen tested if there is no reasonable medical explanation for the positive result.

The MRO shall then promptly report to the Designated Employer Representative which employees or applicants test positive for drugs or adulterants.

H. Request for Retest

Where a split specimen has been collected, an employee may request a retest of the split specimen within 72 hours of notification of the final test result. Requests must be submitted to the MRO.

The employee may be required to pay the associated costs of retest in advance.

I. Release of Test Results

Test results shall not be released by the company, beyond the MRO and Company's management without the individual's written authorization. However, all employees will be required to execute a consent/release form permitting the Company to release test results and related information to Worker's Compensation, Unemployment Compensation Commission, or relevant government agencies.

The MRO shall retain the individual test results for positive specimens for five (5) years and negative results for twelve (12) months.

VII. Discipline / Employee Assistance Program

The Company will discipline employees, up to and including discharge, for any violations of the Policy, including refusal to submit to a screening, to execute a release, or other paperwork, or otherwise cooperate with a test, investigation, or search by the Company. An applicant or employee specimen that is found by the collection site, laboratory or MRO to have been adulterated or substituted will be considered equivalent to a positive test. Possession of, distribution of, or consumption of unlawful or abused drugs, unauthorized alcohol, or drug paraphernalia, or unlawful conduct on or off duty, will also result in discipline, up to and including immediate discharge. Disciplinary measures will be instituted in accordance with state and federal laws.

No employee may be returned to regular duties after any rehabilitation, positive test or other violation of the Policy unless the employee passes a return to duty test and is released as fit for duty by the Company's Substance Abuse Professional (SAP). Any employee returned to duty after rehabilitation, a positive test or other violation of the Policy will be subject to random testing and follow-up testing as defined within the Policy.

Employees are strongly encouraged to obtain assistance if they believe they may have a drug or alcohol problem; however, once an employee is asked to

submit to a test or is suspected of violating the Drug and Alcohol Policy, he or she will not be able to avoid discipline by seeking rehabilitation or counseling.

VIII. Training

The Company shall provide education and training for supervisors who are authorized to determine reasonable suspicion testing. These supervisors must receive a minimum of 60 minutes on alcohol and an additional 60 minutes of training on controlled substance use and abuse. The training shall cover the physical, behavioral, speech and performance indicators of probable use and misuse of alcohol and controlled substances. Documentation of training attendance must be maintained. The Designated Employer Representative should be contacted for further guidance.

IX. Our Rules About Searches

Employees are reminded that permission to bring items, such as bags, onto Company property is conditioned on agreeing to inspection of such items upon request. The Company may, therefore, search, without further advance notice, desks, cabinets, toolboxes, vehicles, including personal vehicles brought on Company property, bags, or any other property at the Company or in its vehicles where the Company has reasonable suspicion to believe employees may have violated the Drug and Alcohol Policy. All searches must be coordinated with and approved by the Company's Designated Employer Representative or their designee.

X. Unemployment/ Worker's Compensation Benefits

Employees who test positive for alcohol or unlawful drugs in a confirmed drug or alcohol test may be disqualified for unemployment compensation benefits. Employees who test positive for alcohol or unlawful drugs following a workplace injury may be disqualified for worker's compensation benefits.

NOTE

These procedures should not be construed as contractual in any nature. They represent the Company's current guidelines in dealing with a developing problem under evolving laws and facts, and may be changed in accordance with Company policy and state and federal law.

Substance Abuse Resources

Information Hotlines

Alcoholics Anonymous (AA)	800-356-9996
American Council on Alcoholism Helpline	800-527-5344
Cocaine Hotline	800-347-8998
National Council on Alcoholism	800-NCA-HELP
National Institute on Drug Abuse Hotline (NIDA)	800-662-HELP
Narcotics Anonymous	800-338-8750
Al-Anon	800-356-9996
Narc-Anon	213-574-5800

National Association of Alcoholism & Drug Abuse Council (NAADAC)

1911 N. Ft. Myer Dr., Suite 900
Arlington, VA 22209
703-741-7686

DRIVER INFORMATION SHEET

POST ACCIDENT TESTING

Post accident drug and alcohol testing is defined in two separate places in regulations. First, a driver must be drug and alcohol tested following an accident if:

"...the accident involved the loss of human life; or...a citation under State or local law for a moving traffic violation arising from the accident..." is issued. This is found in 49 C.F.R. Part 40, Section 382.303.

The second portion of the testing criteria is found in Section 390.5 where a reportable accident is defined as:

"(i) A fatality; (ii) bodily injury to a person who, as a result of the injury, immediately receives medical treatment away from the scene of the accident; or (iii) One or more vehicles incurring disabling damage as a result of the accident, requiring the vehicle to be transported away from the scene by a tow truck or other vehicle."

However, in addition to the standards for DOT mandated testing, it is the policy of this company to administer post-accident drug and alcohol testing in the case of any accident resulting in property damage or bodily injury to any party.

A driver should never leave the scene of an accident except as necessary to summon assistance. The driver must be tested for alcohol within two hours and for drugs within eight hours following an accident. A driver should not use alcohol following an accident until tested or eight hours have passed since the accident. If a driver is unable to provide a specimen for testing because it would interfere with treatment or if an evidential breath testing device is not available, a release should be signed giving the treatment facility permission to provide results of any testing they have done as a part of the treatment.

THINK TWICE

Alcohol use; possession and distribution is prohibited in the workplace. Consequently, a driver should think twice about over-the-counter medication items such as mouthwash before having them on hand. If the solution contains alcohol, and many do, having them in the truck would be a violation of federal law. There are many mouthwashes and cold remedies that do not contain alcohol. Be sure to purchase the non-alcoholic items to have with you while on duty.

Remember, a Breath Alcohol Concentration (BrAC) of 0.02-0.039 means a driver would have to be taken off duty for a minimum of 24 hours. A BrAC of 0.04 or greater results in a driver being disciplined up to and including discharge.

R L C Oilfield Services, LLC
Policy Statement Acknowledgement Form

I have read the Policy Statement and agree to abide by the Company's drug and alcohol rules. I also acknowledge that I have received a copy of the Drug and Alcohol Program Procedures. I agree to submit to alcohol and drug tests at any time as a condition of my initial or continued employment. I authorize any laboratory or medical provider to release test results to R L C Oilfield Services, LLC and its Medical Review Officer (MRO).

I expressly authorize the Company or its MRO to release any test-related information, including positive test results, to the Company's insurers, the Worker's Compensation Commission, Unemployment Compensation Commission, or any relevant government agency. I understand that the test results will not be provided for a criminal investigation except where compelled by legal process.

To the extent permitted by law, I release any legal claims I may have against R L C Oilfield Services, LLC, its affiliates, its officers, and its employees for requiring the test, for conducting searches and for any adverse employment action taken as a result of the test, searches or the result thereof, and actions taken based on such results. I understand that I may still bring a claim of negligence against parties who collect, test and analyze specimens. I understand that this agreement in no way limits my right to terminate employment or be terminated at any time for any reason with or without advance notice in accordance with federal and state law.

Driver's printed name

Driver's signature

Date

R L C Oilfield Services, LLC

1815 Line Ave
Shreveport, LA 71101
318-639-3119

SITE SECURITY PLAN

FOR THE STORAGE AND

TRANSPORATION OF HAZARDOUS MATERIALS

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Appendix

Acknowledgement of Review and Comprehension

Threats and Incidents Form

R L C Oilfield Services, LLC is committed to the safety and security of our employees, our customers, and the general public, all are stakeholders. Since the September 11, 2001 terrorist attacks, it has been necessary for everyone, including the Company and our employees, to be more vigilant in preventing or inhibiting the use of our products, transportation equipment, and facilities by international and domestic terrorist and by those who might collude with such terrorists. All of the Company's employees are asked to help implement this security plan and improve continuously the Company's security efforts. The U.S Department of Transportation's Research and Special Programs Administration has promulgated regulations (known as "HM-232") that, in part, require that any employee of this Company (including independent contractors) who is a "hazmat employee" be trained and be familiar with the Company's security plan. Our understanding of these regulations is that a "hazmat employee" is ANY person who performs a task or function covered by the Federal Hazardous Materials Regulations ("HMR").

Security Risk Assessment

The Company Safety Director (Rick Simpson) has collected, reviewed and integrated information about potential security risks as part of its attempt to understand site-specific and route-sensitive risks to security. The facilities, vehicles, routes or assets have been identified by internal stakeholders as the most significant security risks.

Facility Security

1. The Company designates the Safety Director to be in charge of creating the Site Security Plan for the Company.
2. The Company Safety Director will conduct or manage security awareness training for all employees at each company location, including how to report suspicious incidents or events.
3. All DOT classified employees (drivers) will perform daily safety checks and equipment reconciliations.
4. All personnel will remove keys from trucks not in use and have secure key storage.
5. All employees' will control access to computers by logging in with personnel specific passwords, especially those with product or routing information.

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6. The Company may request periodic checks of facility areas by local law enforcement, especially when the facility is not open.

Personnel Security

The Company Safety Director will implement the following provisions with regard to the employment (including applications for employment) of hazmat drivers. Further, the Company, at its discretion, may implement some or all of these provisions relevant to the employment of non-driver employees who perform functions regulated by the Federal HMR's.

1. Perform detailed biometric background checks on all applicants for any driver or loader positions. All CDL holders will be required to undergo a PSP (Pre-Employment Screening Program) record search.
2. To the extent possible, a check for criminal convictions.
3. Contact previous employers and references
4. Investigate gaps in employment.
5. To the extent possible, have at least 10 years consecutive employment/education records.
6. Maintain employee information in a confidential and secure manner, and in compliance with all relevant Federal and State regulations and statutes regarding confidentiality and individual privacy.
7. Verify that drivers are U.S. citizens or that non-citizens have documentation appropriate to their immigration status.
8. Ensure drivers have current CDL with appropriate endorsements and another form of identification (e.g. company-issued credential or current medical certificate.)
9. Collect company identification card and any security materials when a driver/employee leaves the Company.
10. Update Company websites and lists, as well as cancel passwords to prohibit computer access by former employees.

Unauthorized Access

1. Restricted access to the facility is within a fenced compound with limited entry points.
2. A list of authorized employees and a copy of their driver's license; with access to the facility will be maintained.

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SENSITIVE SECURITY INFORMATION

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3. Visitors to the facility will be escorted by a company employee at all times.
4. Facility has limited entry points and is located on a secure area of company owned property.
5. Access to the facility is controlled by gated, secure fenced area.
6. Within the facility, hazardous materials access is restricted to authorized personnel only storage room(s).area
7. Facility is equipped with monitored/web accessible, alarms, motion sensors and outside security lighting. Video at bulk
 - a. Unauthorized personnel maintenance, contractors, etc. are escorted at all times by authorized personnel.
 - b. A detailed chemical inventory is maintained at all times. (Hard copy or electronic)
8. Facility is visually inspected on a routine basis.
9. The Company will periodically test emergency response communications equipment and procedures.

En Route Security

1. STAY ALERT Follow the written Standard Operating Procedure(s).
2. Drivers will lock truck doors at all times and take keys any time the driver is not with the vehicle. Ensure windows are closed.
3. Drivers will perform "walk around" inspection of vehicles after every stop, including deliveries and breaks.
4. The Company parking instructions for any locations away from any of the company facilities include but are not limited to parking in lighted and/or fenced secured areas; locking company vehicles upon exit.
5. The Company will attempt to include all security considerations in route selection times for pickups and deliveries.
6. Driver "down-time" will be minimized while En route. Schedule as few stops as possible.
7. The Company procedure to communicate emergency messages to all facilities and to drivers on the road is to contact via phone calls and/or text messages to employee cell phones or company e-mails.

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8. The Company communications procedure for drivers to report any unexpected occurrence with equipment, load, or route will be accomplished via cell phone calls if deemed imperative for immediate communication. If no immediate or probable security threat is deemed a text message or detailed e-mail message are acceptable alternatives forms of communication.
9. Drivers (and other "need to know" employees) will not discuss any details about their load or pick-up points and destinations with unauthorized personnel, such as over the CB radio or at truck stops.
10. Drivers will not pick up hitchhikers or allow any unauthorized personnel in the truck cab.
11. Drivers will not stop to help disabled vehicles or motorist. Call local authorities and notify them of anyone needing assistance. Be suspicious of motorist trying to get the driver to pull over for an "alleged" traffic accident. Be especially suspicious of vehicles with three or more people in them.
12. The Company procedure for detecting "late loads" is to contact the driver by phone. Should the driver not respond to the call after one hour has expired an authorized company representative will contact local authorities to investigate.
13. Drivers will not change delivery destination unless authorized.
14. The Company procedure for drivers when being asked to pull over by law enforcement or unmarked vehicles is first to obey all traffic laws pulling over when deemed safe. If the situation appears to be threatening in nature call 911 and pull over when instructed by police personnel to do so. If a driver pulls over to a police siren/stop procedure ask for identification should the officer not appear in a marked police vehicle and/or not in a recognized police uniform.
15. All employees are to report any suspicious events to the Company and local law enforcement.
16. If there is an emergency situation, contact 911 immediately.
17. Do not allow distracting by others during the loading/unloading procedure.

General Security Awareness

- Any employee or visitor making unusual or repeated requests for sensitive or important Company-related information.
- Any person asking a driver to make any unauthorized movement (pick-up and deliver) for cash or other types of compensation.
- Any person or group loitering outside the Company facility.
- Any person claiming to be a representative of a utility (gas, water, electric) but cannot produce company identification.

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- Any person carrying a weapon, such as a gun or knife.
- After hours, any vehicle driving by the Company facility with the lights of their vehicle off.
- Any occupied vehicle parked outside the Company facility – especially if the vehicle has been sitting for a long period or after normal work hours.
- Any unfamiliar vehicle that appears to be abandoned near the Company facility.

Reporting Threats and Incidents

The following information would be helpful to note when reporting on the Threats and Incident Form (See Appendix) any threats or incidents:

- Description of the vehicle(s): Please describe all observables about the truck size, color, markings, as well as license, registration, and other pertinent identifying information.
- Description of the truck's contents: What is the truck carrying, and in what quantity?

Description of the event observation:

- When did the event occur?
- Where did the event occur?
- What direction did the truck head?
- Describe the individual(s) operating the vehicle?
- Did the individual(s) involved in the event say anything about what they were doing or where they intended to go?
- Additional suspects involved, i.e. supporting surveillance vehicle.

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SENSITIVE SECURITY INFORMATION

Active Shooter

An Active Shooter is an individual actively engaged in killing or attempting to kill people in a confined and populated area; in most cases, active shooters use firearms(s) and there is no pattern or method to their selection of victims. Active shooter situations are unpredictable and evolve quickly. Typically, the immediate deployment of law enforcement is required to stop the shooting and mitigate harm to victims. Because active shooter situations are often over within 10 to 15 minutes, before law enforcement arrives on the scene, individuals must be prepared both mentally and physically to deal with an active shooter situation.

HOW TO RESPOND WHEN AN ACTIVE SHOOTER IS IN YOUR VICINITY

Quickly determine the most reasonable way to protect your own life. Remember that customers and clients are likely to follow the lead of employees and managers during an active shooter situation.

1. **RUN** if there is an accessible escape path, attempt to evacuate the premises.
Be sure to:
 - Have an escape route and plan in mind
 - Evacuate regardless of whether others agree to follow
 - Leave your belongings behind
 - Help others escape, if possible
 - Prevent individuals from entering an area where the active shooter may be
 - Keep your hands visible
 - Follow the instructions of any police officers
 - Do not attempt to move wounded people
 - Call 911 when you are safe
2. **HIDE** if evacuation is not possible; find a place to hide where the active shooter is less likely to find you.
Your hiding place should:
 - Be out of the active shooter's view
 - Provide protection if shots are fired in your direction (i.e., an office with a closed and locked door)
 - Not trap you or restrict your options for movement to prevent an active shooter from entering your hiding place:
 - Lock the door
 - Blockade the door with heavy furniture

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- **HOW TO RESPOND WHEN A N ACTIVE SHOOTER IS I N YOUR VICINITY** If the active shooter is nearby:

- Lock the door
- Silence your cell phone and/or pager
- Turn off any source of noise (i.e., radios, televisions)
- Hide behind large items (i.e., cabinets, desks)
- Remain quiet If evacuation and hiding out are not possible:
- Remain calm
- Dial 911, if possible, to alert police to the active shooter's location
- If you cannot speak, leave the line open and allow the dispatcher to listen

3. FIGHT

As a last resort, and only when your life is in imminent danger, attempt to disrupt and/or incapacitate the active shooter by:

- Acting as aggressively as possible against him/her
- Throwing items and improvising weapons
- Yelling
- Committing to your actions

HOW TO RESPOND WHEN LAW ENFORCEMENT ARRIVES

Law enforcement's purpose is to stop the active shooter as soon as possible. Officers will proceed directly to the area in which the last shots were heard.

- Officers usually arrive in teams of four (4)
- Officers may wear regular patrol uniforms or external bulletproof vests, Kevlar helmets, and other tactical equipment
- Officers may be armed with rifles, shotguns, handguns
- Officers may use pepper spray or tear gas to control the situation
- Officers may shout commands, and may push individuals to the ground for their safety

HOW TO REACT WHEN LAW ENFORCEMENT ARRIVES

- Remain calm, and follow officers' instructions
- Put down any items in your hands (i.e., bags, jackets)
- Immediately raise hands and spread fingers
- Keep hands visible at all times
- Avoid making quick movements toward officers such as holding on to them for safety
- Avoid pointing, screaming and/or yelling
- Do not stop to ask officers for help or direction when evacuating, just proceed in the direction from which officers are entering the premises

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INFORMATION TO PROVIDE TO LAW ENFORCEMENT OR 911 OPERATORS:

- Location of the active shooter
- Number of shooters, if more than one
- Physical description of shooter/s
- Number and type of weapons held by the shooter/s
- Number of potential victims at the location

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APPENDIX

SAYLE OIL HAZ-MAT SECURITY PLAN
ACKNOWLEDGEMENT OF REVIEW AND COMPREHENSION

I, the undersigned, have received a copy of R L C Oilfield Services, LLC Site Security Plan dated December 1, 2018 for review. I understand that I am expected to read and understand the entire Sayle Oil Security Plan. Additionally, I will sign this Acknowledgement of Receipt. I understand that this form will be retained in my personnel file.

Signature

Date

R L C Oilfield Services, LLC Representative

Date

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SENSITIVE SECURITY INFORMATION

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**R L C OILFIELD SERVICES,
LLC
THREATS AND INCIDENT REPORT FORM**

Description of the vehicle(s): Please describe all observables about the truck size, color, markings, as well as license, registration, and other pertinent identifying information.

Description of the truck's contents: What is the truck carrying, and in what quantity?

Description of the event or observation:

- When did the event occur? _____
- Where did the event occur? _____
- What direction did the vehicle head? _____
- Describe the individual(s) operating the vehicle.

-
- Did the individual(s) involved in the event say anything about what they were doing or where they intended to go? _____
 - Any additional suspects involved, i.e. supporting surveillance vehicle, or lookouts? _____
-

Signature

Date

R L C Oilfield Services, LLC Representative

Date

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SENSITIVE SECURITY INFORMATION

R L C OILFIELD SERVICES, LLC HAZARDOUS MATERIALS TRAINING

I, the undersigned, have received Hazardous Material Training: General Awareness/Familiarization, Function specific training, safety training and security training. I sign this Acknowledgement of Receipt. I understand that this form will be retained in my personnel file.

Signature

Date

R L C Oilfield Services, LLC Representative

Date

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SENSITIVE SECURITY INFORMATION

**SITE SECURITY PLAN FOR THE STORAGE AND
TRANSPORTATION OF HAZARDOUS MATERIALS**
TEST

1. What method does R L C Oilfield Services, LLC use to perform background checks on its HazMat employees? _____
2. Hazardous material access is restricted to authorized personnel only.
True_____or False_____
3. Anyone in the facility may remove or take delivery of a hazardous material.
True_____or False_____
4. If you are busy it is ok to allow maintenance, laborers, contractors, and freight companies that you know access to hazardous material area unescorted.
True _____or False_____
5. A CDL driver transporting HazMat in the Company truck has a blowout and pulls over onto the shoulder of the highway. The driver should fix the flat and continue to the job site.
True_____or False_____
6. A CDL driver who stops to eat lunch should not discuss pick-up points or destinations with unauthorized personnel.
True_____or False_____
7. It is OK to pick up a hitchhiker or stop to help a disabled vehicle or motorist.
True_____or False_____
8. What should employees do when they see anything suspicious?_____
9. CDL driver transporting HazMat should perform a_____ inspection of the vehicle after every stop.
10. The following information would be helpful to make note of when reporting on threats or incidents. When did the incident occur? Where did the event occur? What direction did the vehicle or individual head when they left the area?
True_____or False_

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SENSITIVE SECURITY INFORMATION

TEST ANSWER KEY

1. ***Answer: R L C Oilfield Services, LLC performs biometric background checks on all CDL applicants.***
2. ***Answer: True***
3. ***Answer: False, Only authorized employees may take deliver or remove hazardous materials from facility.***
4. ***Answer: False, only authorized employees are allowed.***
5. ***Answer: False, he must first report to his manager about the delay and then continue after repairing the flat tire.***
6. ***Answer: True, Only "Need to Know" employees should discuss delivery or pick-up destinations***
7. ***Answer: False, CDL drivers can't stop to help when transporting HazMat or pick up hitchhikers.***
8. ***Answer: Employees are required to report any suspicious events to the company and local law enforcement.***
9. ***Answer: "Walk Around" Inspection of the vehicle after every stop***
10. ***Answer: True***

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SENSITIVE SECURITY INFORMATION

PERIODIC REVIEW CERTIFICATION

I the undersigned to hereby certify that as the designated representative of R L C Oilfield Services, LLC, Inc. I have performed a review of the content of this document, and find it to be representative of the Security Measures as outlined in 49CFR Parts 15 and 1520. Additionally that those necessary changes and/or amendments have been made to the pages of this document. As changes occur and take place additional revisions and/or reviews will be made and documented to reflect those changes.

December 1, 2018

Ricky Cleveland
Operations Manager

Date of Review

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PROGRESSIVE DISCIPLINE POLICY FOR FAILURE TO COMPLETE DRIVER VEHICLE INSPECTIONS

It is the responsibility of each driver/ contractor working for R L C Oilfield Services, LLC to be familiar with the rules governing recordkeeping of their daily vehicle inspections. All drivers are expected to properly conduct daily inspections (pre-trip and post-trip) of their vehicles and to record the post-trip inspection in accordance with the rules set forth in 49 CFR, Part 396.

Our policy regarding discipline as a result of repetitive driver vehicle inspections violations is as follows:

Violations of this policy will be reviewed on a monthly basis. For the purpose of exacting disciplinary action under this policy, the total review period will be a sliding six month period (most recent review month and the five months previous to that month). If a driver has three (3) or more violations listed below, the appropriate disciplinary action described in the table below will be taken.

Violations

Failure to properly complete a DVIR for any day on which a CMV was operated
Failure to surrender a DVIR within 13 days of the date of completion

Disciplinary action to be taken

Within a sliding six month period:

1st occurrence of one (1) or more violations within a single month will result in driver receiving a written warning of violations.

2nd occurrence of one (1) or more violations within a single month will result in driver receiving a written notice of the violations and being required to attend a training class on driver vehicle inspections procedures.

3rd occurrence of one (1) or more violations within a single month will result in driver receiving a written notice of violations, a verbal counseling session with the safety department, and being required to attend a class on driver vehicle inspections procedures.

4th occurrence of one (1) or more violations within a single month will result in the driver being terminated without eligibility for rehire.

I have received and understand this policy and its potential effect on my eligibility for dispatch or employment.

Driver's signature

Date

Witness - Company representative