



## Event Reporting and Investigation Protocol

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### 1. ABOUT THIS PROTOCOL

Purpose	This protocol was established to ensure that EHS events are reported and investigated.
Objective	This protocol establishes minimum requirements for reporting and investigating EHS events (e.g., hazard id's, FIO's, near misses, incidents, and reviews).
Scope	This protocol includes requirements for hazard id reporting, FIO reporting, near miss reporting, incident reporting, Devon investigation process, contractor investigations, post incident drug testing, and agency/regulatory non-compliance.
Applicability	<p>This protocol applies to all Devon employees and at all Devon operated facilities.</p> <p>Contractors will report EHS events, which occurred at Devon locations to Devon personnel. Contractors will have a program which defines their investigation process, corrective action tracking and training requirements for investigation leads.</p>
Variances	None
Superseded Documents	Incident Reporting Protocol



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### 3. ROLES

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Division/Business Unit Leadership	Reinforce adherence to this protocol and provide resources for application of the protocol. Ensure employees responsible for event reporting and investigation receive required training.
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Line Supervisor	Understand how this protocol applies to personnel in their area of responsibility. Ensure employees have training, skills, knowledge and understanding to comply with this protocol. Check periodically to ensure the requirements of this protocol are being met.
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Environmental, Health and Safety	Provide technical resources and tools for protocol application. Monitor compliance through the audit process.
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Devon Employees	Adhere to the requirements of this protocol. Identify and report gaps in this protocol. Complete required training.
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Contract Company Representative	Comply with regulatory requirements and follow this protocol.
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### 4. PROTOCOL PREREQUISITES

#### 4.1 PROTOCOL OVERVIEW

This Devon Energy EHS protocol establishes requirements for reporting and investigating EHS events including hazard id's, FIO's, near misses and incidents as well as requirements for post incident drug testing and agency/regulatory non-compliance.

#### 4.2 APPLICABLE STANDARDS

29 CFR 1904 Subpart C - Recordkeeping Forms and Recording Criteria  
Devon Drug and Alcohol Abuse Prevention and Testing Policy  
Devon EHS Risk Management Protocol  
Devon DOT Natural Gas Pipeline Procedural Manual  
Devon DOT Hazardous Liquids Pipeline Procedural Manual

#### 4.3 REQUIRED MATERIALS, EQUIPMENT, INFORMATION, OR OTHER RESOURCES

None.

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## 5. PROTOCOL

Legal guidance may be essential throughout the course of reporting and investigating events that occur to Devon personnel or at Devon facilities. Engage the Devon Legal Department when necessary. Additional legal guidance is outlined in individual steps of this protocol.

### 5.1 HAZARD ID REPORTING

Hazard ID reporting is an action to report anything that has been observed with the potential to hurt someone or the organization, but that does not result in a near miss or incident.

Step	Required Action	Role
5.1.1	The event reporting/investigation system may be used to document hazard ID's.	Event Reporter

### 5.2 FOR INFORMATION ONLY (FIO) REPORTING

FIO reporting is an action to report events for informational awareness purposes and that are not classified as a near miss or incident.

Step	Required Action	Role
5.2.1	Report FIO's immediately to the PIC or line supervisor when they occur.	Employee / Contractor
5.2.2	Enter initial information into the event reporting/investigation system via computer or mobile application as soon as possible.	Event Reporter
<b>Note:</b> The following will be entered in the event reporting/investigation system as FIO: <ul style="list-style-type: none"> <li>• Non-treatment or refused treatment injuries</li> <li>• Motor Vehicle Incident (MVI) involving wildlife strike</li> <li>• Property damage events that include: <ul style="list-style-type: none"> <li>○ Vehicle wildlife strikes</li> </ul> </li> </ul>		

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**Note:** The following are not required to be entered in the event reporting/investigation system:

- Personal illness events
- Property damage events that include:
  - Rock chips on vehicle windows
  - Hail damage
  - Damage with no risk of injury
  - Third party equipment damage that did not have potential for injury
- Equipment failure events that include:
  - Equipment failure without Near Miss potential
  - Third party equipment failure that did not have potential for injury

**Note:** Theft and vandalism are not EHS event types and are not required to be entered in the event reporting/investigation system. These events should be reported to Devon Security.

## 5.3 NEAR MISS REPORTING

Near miss reporting is important to determine the actions that could prevent a near miss from potentially becoming an incident. Near miss reporting is an action to proactively identify, manage and prevent potential incidents for the organization.

Step	Required Action	Role
5.3.1	Report near misses immediately to the PIC or line supervisor when they occur.	Employee / Contractor
5.3.2	Determine if the near miss is a SIF event.  Note: See the SIF Determination Tool ( <a href="#">Appendix A</a> ) for additional guidance on determining SIF events.	Line Supervisor / EHS
	<b>Note:</b> The operations vice president will be the event reporting/investigation system event owner for all SIF events.	
5.3.3	Classify near misses using the Event Classification Table ( <a href="#">Appendix B</a> ).	EHS
	<b>Note:</b> Near misses should be classified based on the associated consequence of the incident type that could have occurred.	



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5.3.4	Enter initial information into the event reporting/investigation system via computer or mobile application as soon as possible.	Event Reporter
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5.3.5	Review the near miss record and make any additions or modifications.	Event Manager
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5.3.6	Assign corrective actions when appropriate in the event reporting/investigation system to address/reduce potential for near miss to recur.	Event Manager
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### 5.4 INCIDENT REPORTING

Incident reporting and classification are important to determine the measures that will prevent the incident from recurring. Event managers, with input from operations supervisors, will make the determination on incident and SIF classification. The EHS manager will have the final determination on classification. All incidents will be recorded in accordance with this protocol across all Devon operations.

Step	Required Action	Role
5.4.1	Report all incidents to the PIC or line supervisor immediately.	Employee / Contractor
5.4.2	When necessary, contact emergency services and render first aid, if trained to do so.  <b>Note:</b> For non-life-threatening injuries, Axiom Medical Consulting - (877) 502-9466 can be used to provide injury treatment and advice for Devon employees. When Axiom is contacted, the injured person will discuss the nature of the injury with a medical professional. The medical professional will recommend a treatment course and follow up with the injured person at determined intervals. Additional details on Axiom can be found <a href="#">here</a> .	Employee / Contractor
5.4.3	Secure the area to prevent additional injuries or continued release.	Employee/ Contractor
5.4.4	Evaluate incident to determine if Incident Management Team (IMT) activation is required based on area emergency response plans. Activate the IMT, when appropriate, to assist in managing the incident.	Line Supervisor / EHS
5.4.5	Notify Emergency Management (405-228-8899) and Security Control (800-361-3377) when IMT is activated.	Incident Commander

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5.4.6 Make internal notification(s) according to the Internal Notification Requirements Based on Event Class Diagram ([Appendix C](#)) and the Notification Flow Chart ([Appendix D](#)). Line Supervisor / Incident Commander / EHS

5.4.7 Make required external notification(s) per [Appendix E](#). Line Supervisor / EHS

**Note:** Federal and state notification(s) must be completed in accordance with applicable regulations.

5.4.8 Preserve information and the incident scene, if it does not continue to contribute to a hazard or hazardous situation to aid in a potential investigation. The incident scene will be preserved until approval is given by supervision. Employee / Line Supervisor

**Note:** Preserving information may include the following:

- Rope off or barricade the scene, lock doors or gates and exclude unnecessary personnel. Post security personnel if needed.
- Note evidence that may have been disturbed by the emergency response.
- Start recording the names and contact information of witnesses.
- In some cases, initial statements may need to be taken by the employee or line supervisor prior to the arrival of the investigation team lead/lead investigator.

5.4.9 Determine if the incident is a SIF event. Line Supervisor / EHS

**Note:** See the SIF Determination Tool ([Appendix A](#)) for additional guidance on determining SIF events.

**Note:** The operations vice president will be the event reporting/investigation system event owner for all SIF events.

5.4.10 Classify incidents using the Event Classification Table ([Appendix B](#)) and the First Aid Treatment List ([Appendix F](#)). EHS

5.4.11 Review contractor injuries, if applicable using the Contractor Injury Metric Recording Guide ([Appendix G](#)) to determine if entry in the event reporting/investigation system is required. Event Manager

5.4.12 Enter initial information into the event reporting/investigation system via computer or mobile application as soon as possible. Event Reporter

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5.4.13 Review the incident record and make any additions or modifications. Event Manager

5.4.14 Assign corrective actions when appropriate in the event reporting/investigation system to address/reduce potential for incident to recur. Event Manager

### 5.5 DEVON INVESTIGATION PROCESS

Investigations are one of the methods that are used to improve environmental and safety performance.

Step	Required Action	Role						
5.5.1	<p>Conduct a formal investigation for all SIF events (actual, potential, or near miss). A formal investigation will include the following:</p> <ul style="list-style-type: none"><li>Facilitator trained in the investigation technique/methodology (e.g., TapRoot, Root Cause Analysis (RCA)) that will be used</li><li>Team of individuals consisting of EHS, operational support and technical resources, as needed</li><li>Documentation identified in step 5.5.7</li></ul> <p><b>Note:</b> Investigation is not required for non-SIF events unless the BU elects to conduct one.</p> <p><b>Note:</b> For consideration to waive a SIF investigation, submit a <a href="#">SIF Investigation Waiver Request Form</a> to the appropriate EHS leader. Refer to step 5.5.7 for additional documentation requirements.</p> <p><b>Note:</b> Consider using an investigation lead from outside the operating area for SIF events.</p>	Investigation Lead						
5.5.2	Perform a formal investigation on agency non-compliance events that have the potential to be Class 4 or 5 in the Event Classification Table ( <a href="#">Appendix B</a> ). Investigate other agency non-compliance as appropriate. Depending on the non-compliance, enter investigation and corrective actions in the event reporting/investigation system.	EHS / Line Supervisor						
5.5.3	Initiate the investigation process within the time limits listed in the table below.	Investigation Lead						
<table><tr><th>Incident Type</th><th>Investigation Initiation Timeframe</th></tr><tr><td>SIF Actual / SIF Potential</td><td>2 Business Days</td></tr><tr><td>SIF Near Miss</td><td>7 Days</td></tr></table>		Incident Type	Investigation Initiation Timeframe	SIF Actual / SIF Potential	2 Business Days	SIF Near Miss	7 Days	
Incident Type	Investigation Initiation Timeframe							
SIF Actual / SIF Potential	2 Business Days							
SIF Near Miss	7 Days							



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**Note:** The Legal Department may issue guidance for significant events.

5.5.4 Complete investigation within 30 days of the event if possible. Investigation Lead

5.5.5 Conduct a management review of the SIF investigation findings with the responsible supervisor, area manager and EHS leaders. Investigation Lead

5.5.6 Ensure that corrective actions have been developed and assigned at the conclusion of the management review meeting. Event Manager

5.5.7 Document the following information in the event reporting/investigation system. Investigation Lead

<b>Formal Investigation</b>	<ul style="list-style-type: none"><li>• Corrective actions</li><li>• Root cause(s) including comments for the cause(s) identified</li><li>• Upload associated investigation material, photos, statements, reports, and presentations in the event reporting/investigation system</li></ul>
<b>Informal Investigation</b>	<ul style="list-style-type: none"><li>• Corrective actions – if applicable</li><li>• Root cause(s) including comments for the cause(s) identified</li></ul>
<b>No Investigation</b>	<ul style="list-style-type: none"><li>• No corrective actions</li><li>• Upload the <a href="#">SIF Investigation Waiver Form</a></li></ul>

### 5.6 CONTRACTOR INVESTIGATION

Generally, contractors Devon hires are independent contractors. As independent contractors, they are responsible for investigating any events involving their equipment and personnel while employed by Devon, just as they are responsible for the performance of their work. Depending on the event circumstances, Devon may conduct its own investigation, or request to lead or participate with the contractor in the subsequent investigation to ensure a thorough investigation to identify all root causes, contributing factors and potential corrective actions necessary to avoid the recurrence on Devon locations. Devon will typically conduct or participate in the subsequent investigation of contractor events involving:

- Devon company employees
- Damage to Devon property, facilities, or assets
- More than one contract company, or
- Severe injury, death, significant property damage or significant spill

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While Devon employees may conduct or participate in initial fact-gathering activities without Legal Department involvement, the Legal Department will be contacted for legal guidance before initiating or participating in investigations of contractor events. Investigation results and findings will be reviewed by appropriate Devon management and the Legal Department once they are completed.

Step	Required Action	Role
5.6.1	Engage Devon's Legal Department for guidance prior to participating in a contractor's investigation or initiating a Devon investigation for a contractor event.	EHS / Investigation Lead
5.6.2	Conduct a management review of the SIF investigation findings with the responsible supervisor, area manager, and EHS leaders. See <a href="#">Appendix H</a> for further guidance on the management review presentation guidelines for contractor SIF investigations.	EHS / Investigation Lead

### 5.7 POST INCIDENT DRUG TESTING

Step	Required Action	Role
5.7.1	Review the <a href="#">Drug and Alcohol Abuse Prevention and Testing Policy</a> and work with your HR Business Partner to determine if an employee is required to undergo post-incident drug testing.  <b>Note:</b> Some employees are identified as DOT employees and they are subject to Devon's DOT PHMSA Drug & Alcohol Policy which has different post-incident testing requirements.	Line Supervisor

### 5.8 AGENCY/REGULATORY NON-COMPLIANCE

Step	Required Action	Role
5.8.1	Notify field EHS upon receiving an agency/regulatory non-compliance.  <b>Note:</b> Traffic violations are not classified as agency non-compliance.  <b>Note:</b> Provide Devon's Legal Department copies of agency non-compliance notices for all incidents classified as Class II and greater.	Line Supervisor
5.8.2	Review the agency/regulatory non-compliance and classify the non-compliance according to the Event Classification Table ( <a href="#">Appendix B</a> ).	EHS





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5.8.3	Document the agency/regulatory non-compliance in the event reporting/investigation system as an EHS assurance event.	Event Manager
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5.8.4	Assign corrective actions when appropriate in the event reporting/investigation system to address/reduce potential for non-compliance to recur.	Event Manager
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## 6. TERMS AND DEFINITIONS

### Event Types

**Assurance Event** An activity that is done to manage our EHS processes. Assurance activities include: agency reviews / audits (external), internal EHS reviews / audits / inspections, emergency exercises, non-compliance / non-conformance (self-reported) or GAP analysis process.

**For Information Only (FIO)** Events that Devon enters in the event reporting/investigation system for information awareness purposes.

**Note:** The following will be entered in the event reporting/investigation system as FIO:

- Non-treatment or refused treatment injuries
- Motor Vehicle Incident (MVI) involving wildlife strike
- Property damage events that include:
  - Vehicle wildlife strikes

**Hazard ID** Observing anything that has the potential to hurt you, someone else or the organization.

**Incident** An event or occurrence resulting in a personal injury, a spill, a release into the environment, regulatory non-compliance, property damage, fire, motor vehicle damage, equipment failure, complaint, or other loss.

**Near Miss** An event that occurred and could have but did not result in an incident.

### Incident Types

**EHS Complaint** Event related to environmental, health and safety concerns identified by a member of the public, leaseholder, or landowner. This type is used to document and track agency Notice of Violation (NOV)/Notice of Enforcement (NOE).

- **Regulator Complaint** - used to document and track agency NOV in which no enforcement action is taken.
- **Regulator Complaint NOV** - used to document and track agency NOV/NOE in which enforcement action is taken. (This may include, but

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not be limited to: monetary, criminal, civil and/or consent decree/settlement).

## Equipment Failure

Failure of a piece of equipment that resulted in an EHS related event or near miss.

**Note:** The following equipment failure events are not required to be entered in the event reporting/investigation system:

- Equipment failure without near miss potential
- Third party equipment damage that did not have potential for injury

## Injury / Illness

An event which resulted in a work-related injury or illness to a Devon employee, contractor, sub-contractor, or visitor.

**Note:** The following injury/illness events will be entered in the event reporting/investigation system as FIO:

- Non treatment or refused treatment injuries

**Note:** The following injury/illness events are not required to be entered in the event reporting/investigation system:

- Personal illness events

## Line Strike

An event where a pipeline, flow line, gathering line, electrical line, instrument line (cable) or communications line was struck.

## Motor Vehicle Incident (MVI)

Any vehicle incident involving a company-owned, leased or rented vehicle while being operated. Events involving a vehicle that is parked will be entered as a "property damage" event.

**Note:** The following MVI events will be entered in the event reporting/investigation system as FIO:

- Vehicle wildlife strikes

**Note:** A preventable MVI is a vehicle incident in which the driver failed to do everything reasonable to avoid it.

**Note:** MVI preventability is documented in the event reporting/investigation system.



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### Pipeline Failure/Leak

Event where a section of regulated line or piping failed resulting in a release.

**Note:** Regulated pipeline incidents or accidents may be subject to federal and/or state reporting requirements. Refer to [Appendix E](#) and the respective Devon DOT Pipeline Procedural Manual for specific reporting requirements on natural gas and hazardous liquids pipelines.

### Property Damage

Incidents which involve damage to Devon-owned, operated, or leased equipment. Property damage also includes damage inflicted by Devon operations to third party or stakeholder assets. This includes operations being performed by contractors on behalf of Devon. Fires will be classified as property damage incidents; all fires require entry into the event reporting/investigation system.

**Note:** The following property damage events will be entered in the event reporting/investigation system as FIO:

- Vehicle wildlife strikes

**Note:** The following property damage events are not required to be entered in the event reporting/investigation system:

- Rock chips on vehicle windows
- Hail damage
- Damage with no risk of injury
- Third party equipment damage that did not have potential for injury

**Note:** Theft and vandalism are not EHS event types and are not required to be entered in the event reporting/investigation system. These events should be reported to the Security Department.

### Unplanned Air Release

Any event that involves a regulatory reportable release of product or material to the air.

### Spill

When liquid or slurry is lost or discharged without regulatory authorization from its primary containment, including but not limited to, oil, condensate, produced water, frac fluids, drilling mud, chemicals, etc. See [Appendix I](#) for further guidance on spill reporting and remediation responsibilities. See [Appendix J](#) for event reporting/investigation system spill cause definitions.

**Note:** The following spill events are not required to be entered in the event reporting/investigation system:

- Spills < 1 barrel



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### Event Reporting/Investigation System Roles

Event Advisor	EHS individual who may review the details of an event in the event reporting/investigation system.
Event Manager	EHS individual who works with supervisor(s) to manage and close the event and may enter investigation information in the event reporting/investigation system.
Event Owner	An individual who has overall accountability for the event, investigation, and corrective action(s) in the event reporting/investigation system.
Event Reporter	An individual who initially reports the event to supervision.
Investigation Lead	An individual who prepares, conducts, and reports on the results of an investigation.

### Treatment / Other Event Related Terms

Days Away	The number of days away from work after an injury. This does not include the initial day of injury, the day the employee returns to work or days when the employee had to travel to medical facilities for evaluation. The days are counted continuously including weekends, holidays, normal days off, etc. as if the employee were required to work, until employee can return to work.
Days Away Incident	A work-related injury or illness which prevents the injured person (IP) from performing any work on the next scheduled workday.
Fatality	A work-related injury or illness that results in a death.
First Aid Case	A work-related injury or illness that is treated with one of the methods on the First Aid Treatment List ( <a href="#">Appendix F</a> ). Any other treatment is considered medical aid.
Life-altering Injury or Illness	A work-related injury or illness that results in permanent impairment.

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**Life-threatening Injury or Illness** A work-related injury or illness that will require the immediate intervention of internal and/or external emergency response personnel to provide life-sustaining support.

**Medical Treatment Only Case (MTOC)** A work-related injury or illness that requires medical treatment but does not result in a Days Away or Restricted Workday Case (RWC).

**Occupational Illness** Any abnormal condition or disorder other than one resulting from an occupational injury caused by exposure to environmental factors associated with employment. Occupational illnesses include acute and chronic illnesses or diseases that may be caused by inhalation, absorption, ingestion, or direct contact.

**Permanent Impairment** A work-related injury or illness of an acute/single incident that resulted in any of the following:

- Permanent loss of body part(s)
- Permanent reduction of organ function
- Permanent reduction in skin and/or musculoskeletal function
- Permanent reduction in psychological, social, or cognitive function

**Permanent Loss of Body Parts** Permanent loss of a body part because of an acute/single work-related injury or illness due to mechanical trauma, thermal trauma, radioactivity, vibration, chemical exposure, etc. including but not limited to:

- Amputations with loss of bone inclusive of one or more joints (not able to be reattached)
- Loss of eye(s)
- Loss of internal organs (e.g., kidney, spleen, etc.)
- Loss of facial structures leading to disfigurement (e.g., nose, ear(s))
- Loss of genitalia or other sexual organs

**Note:** Successful use of limb prosthesis to improve function does not negate a permanent impairment definition.

**Note:** On a case-by-case basis, when diagnosis of permanent impairment is unclear, a medical professional opinion should be used to determine permanent impairment.

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Permanent Reduction of Organ Function      Permanent reduction in an organ's physiological function because of an acute/single injury or illness due to mechanical trauma, radioactivity, vibration, chemical exposure, etc. including but not limited to:

- Eye injury with loss of vision
- Bowel injury requiring permanent stoma
- Spinal injury requiring use of wheelchair
- Brain injury causing epilepsy (recurrent seizures)
- Heart injury with impaired exertion tolerance / measurable loss of function
- Lung injury, including inhalation, with impaired exertion tolerance / measurable loss of function
- Loss of smell that creates a safety concern of significant personal impact
- Loss of hearing or persistent tinnitus (ear ringing) post injury after exposure to a blast
- Post injury complex pain disorders with uncontrolled pain and/or disrupted nerve and musculoskeletal function
- Genital or other sexual organ injury leading to loss of function

**Note:** On a case-by-case basis, when diagnosis of permanent impairment is unclear, a medical professional opinion should be used to determine permanent impairment.

Permanent Reduction in Skin and/or Musculoskeletal Function      Permanent reduction in skin and/or musculoskeletal function because of an acute/single injury or illness due to a mechanical trauma, thermal trauma, radioactivity, vibration, chemical exposure, etc. including but not limited to:

- Burns: deep burns with scarring or skin grafts that impair body movement or function (e.g., 2<sup>nd</sup> or 3<sup>rd</sup> degree burns caused by thermal or chemical exposure, etc. and includes a reduction of skin integrity, hypersensitivity to touch, or skin fragility leading to friction ulceration)
- Tendon/ligament tear with ongoing pain and/or inadequate joint range of movement for normal work or general function (e.g., cannot reach overhead, cannot squat, or kneel, etc.)
- Traumatic soft tissue injury to shoulder/knee/elbow with ongoing pain and/or inadequate range of movement
- Fracture with ongoing impairment to mobility
- Amputation with successful reattachment but reduced function

**Note:** On a case-by-case basis, when diagnosis of permanent impairment is unclear, a medical professional opinion should be used to determine permanent impairment.

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Permanent  
Reduction in  
Psychological,  
Social, or  
Cognitive  
Function

Permanent reduction in psychological, social, or cognitive function because of an acute/single injury or illness with psychological trauma including an inability to self-care and/or an inability to maintain previous work, social and community relationships post incident including but not limited to:

- Brain injury with ongoing impact to emotional regulation, speech, memory, or other cognitive dysfunction
- Post injury psychiatric disorders including Post Traumatic Stress Disorder (PTSD) with inability to return to previous work role and/or schedule

**Note:** On a case-by-case basis, when diagnosis of permanent impairment is unclear, a medical professional opinion should be used to determine permanent impairment.

Recordable  
Incident

Incident that includes any work-related:

- Fatality
- Injury or illness that results in loss of consciousness, days away from work, restricted work, or transfer to another job
- Injury or illness requiring medical treatment beyond first aid
- Diagnosed case of occupational illness, fractured, or cracked bone or tooth or punctured eardrum

Restricted  
Workday Case  
(RWC)

Work-related injury or illness that physically or mentally prevents an individual from performing any part of their normal job duties.

Serious Injury  
or Fatality (SIF)

An event that resulted in one of the following:

- SIF Actual
- SIF Potential
- SIF Near Miss

SIF Actual

An event that resulted in one of the following:

- Life-threatening injury or illness
- Life-altering injury or illness
- Fatality

SIF Potential

An event that resulted in an injury or illness that could have realistically resulted in a life-threatening injury/illness, life-altering injury/illness, or fatality.





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**SIF Near Miss** An event that could have realistically resulted in a life-threatening injury/illness, life-altering injury/illness, or fatality where there was no actual injury or illness.

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### General Terms and Definitions

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**Area** Individual operating fields or components that collectively comprise a region; areas normally include an area office.

---

**Business Unit** Individual components that collectively comprise the U.S. Division. Business units may also be referred to as Basins.

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**Contract Company Representative** A contractor who is assigned responsibilities and oversight for a specific task that requires adherence to Devon EHS Protocols.

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**Division** The division operations of Devon are Strategic-Services, Corporate, Facilities and Pipeline and U.S.

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**Enterprise Classification Structure (ECS)** Part of Devon's strategic plan for managing information assets. The ECS is the published list of all records classes, the period for retaining each and their designated disposition.

---

**Facility** A collection of structures, piping, valves, vessels, tanks, compression, and processing equipment located in close geographic proximity, that are involved directly in the development, production, processing or delivery of oil and gas to market (e.g., a tank battery, drill site, well-site, compressor station, pipeline, or gas plant).

---

**Field EHS** A titled position that provides EHS guidance and support within a Division.

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**Line Supervisor** A titled position that has assigned authority and responsibility for financials, production, maintenance, projects, and personnel for a defined area. In Devon, this could be any manager, supervisor, superintendent, foreman or assistant foreman. For the support organization it could be any vice president, manager, leader, or supervisor.

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Person-in-  
Charge (PIC)

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A person that has been authorized by Devon to perform specific tasks.

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## 7. DOCUMENT MANAGEMENT

### 7.1 REVISION DETAILS

The changes made to this Protocol during the latest revision can be found in the [Event Reporting and Investigation Approval, Review and Modification History](#) document.

### 7.2 APPROVAL

This procedure has been approved by:

Name	Title
Garrett Jackson	VP, ESG & EHS

### 7.3 SEEKING AND APPROVING VARIANCES

Variances to this document will be submitted in accordance with the EHS Document Control and Records Management Protocol.

### 7.4 RELATED DOCUMENTS

Document Name
<a href="#">SIF Determination Tool</a>
<a href="#">Axiom Info Sheet</a>
<a href="#">SIF Investigation Waiver Request Form</a>
<a href="#">Dropped Object Calculator</a>
<a href="#">SIF Investigation and Review SOP</a>
<a href="#">Vehicle SIF Crash Calculator</a>
<a href="#">Contractor SIF Investigation Management Review Guidelines</a>
<a href="#">Approval, Review and Modification History</a>
<a href="#">Safety Alert Review and Approval Flow Chart</a>
<a href="#">Safety Alert Template</a>

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## 8. ADDITIONAL RELATED INFORMATION

### 8.1 TRAINING AND CERTIFICATION REQUIREMENTS

Step	Required Action	Role
8.1.1	Verify Devon employees have completed the Event Reporting and Investigation Protocol training.	Line Supervisor
8.1.2	Ensure contract company representative understands the requirements of this protocol.	Line Supervisor

### 8.2 RECORDS/LOGS/REPORTS

Step	Required Action	Role
8.2.1	Keep records listed below.	Employees

Record	File Location & Number	Retention Time	Enterprise Classification Structure (ECS) Code
Event Reports	Event Reporting/Investigation System	10 Years	EH50
Investigation Material	Event Reporting/Investigation System	10 Years	EH50
Corrective Actions	Event Reporting/Investigation System	10 Years	EH50

**Note:** The Records Management ECS Code is listed as a reference, which should be used when records are sent to stored records.

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## APPENDIX A: SIF DETERMINATION TOOL

A Serious Injury or Fatality (SIF) is an event that resulted in one of the following: SIF Actual, SIF Potential, or SIF Near Miss.

SIF Actual is based on the actual outcome of the event injury/illness. SIF Actual is an event that resulted in one of the following: Life-threatening injury/illness, Life-altering injury/illness, or Fatality.

### SIF Actual

If yes to any of the following, event is SIF Actual. Did the event result in any of the following:

1. Life-threatening injury or illness: work-related injury or illness that will require immediate intervention of internal and/or external emergency response personnel to provide life-sustaining support
2. Life-altering injury or illness: work-related injury or illness that resulted in permanent impairment (includes any of the following):
  - a. Permanent loss of body part(s) (includes any of the following):
    - i. Amputations with loss of bone inclusive of one or more joints (not able to be reattached) (does not include teeth)
    - ii. Loss of eye(s)
    - iii. Loss of internal organs (e.g., kidney, spleen, etc.)
    - iv. Loss of facial structures leading to disfigurement (e.g., nose, ear(s))
    - v. Loss of genitalia or other sexual organs
  - b. Permanent reduction of organ function (includes any of the following):
    - i. Eye injury with loss of vision
    - ii. Bowel injury requiring permanent stoma
    - iii. Spinal injury requiring use of wheelchair
    - iv. Brain injury causing epilepsy (recurrent seizures)
    - v. Heart injury with impaired exertion tolerance / measurable loss of function
    - vi. Lung injury, including inhalation, with impaired exertion tolerance / measurable loss of function
    - vii. Loss of smell that creates a safety concern of significant personal impact
    - viii. Loss of hearing or persistent tinnitus (ear ringing) post injury after exposure to a blast
    - ix. Post injury complex pain disorders with uncontrolled pain and/or disrupted nerve and musculoskeletal function
    - x. Genital or other sexual organ injury leading to loss of function
  - c. Permanent reduction in skin and/or musculoskeletal function (includes any of the following):
    - i. Burns: deep burns with scarring or skin grafts that impair body movement or function (e.g., 2<sup>nd</sup> or 3<sup>rd</sup> degree burns caused by thermal or chemical exposure, etc. and includes a reduction of skin integrity, hypersensitivity to touch, or skin fragility leading to friction ulceration)
    - ii. Tendon/ligament tear with ongoing pain and/or inadequate joint range of movement for normal work or general function (e.g., cannot reach overhead, cannot squat, or kneel, etc.)
    - iii. Traumatic soft tissue injury to shoulder/knee/elbow with ongoing pain and/or inadequate range of movement
    - iv. Fracture with ongoing impairment to mobility

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SIF Potential is based on the actual outcome of the event injury/illness and what the potential outcome could have been. SIF Potential is an event that resulted in an injury or illness that could have realistically resulted in a life-threatening injury/illness, life-altering injury/illness, or fatality.

### SIF Potential

If event results in an injury or illness (excluding life-threatening, life-altering, or fatality) and yes to any of the following, **very likely** there is SIF Potential. Did the event involve:

1. Uncontrolled release of energy (e.g., high pressure lines, cable tension, stored energy)?
2. Dropped object - heavy enough and high enough? See dropped object calculator below.
3. Heavy equipment operation (e.g., cranes, forklifts, backhoes, crown outs)?
4. Rotary equipment (e.g., pump jack, top drive, power swivels, power tongs (not grinders))?
5. Excavation (e.g., line strike, cave in, confined space entry)?
6. Electricity (e.g., control panels, overhead power lines, buried cables)?
7. Chemical exposure (e.g., IDLH, H<sub>2</sub>S, CO, HCL, acid spray)?
8. Fires or explosions?
9. Hydrocarbon or hazardous air releases?
10. Falls over 4' vertical (including stairs and ladders)?
11. Driving (use motor vehicle determination tool)?
12. Exposure to temperature extremes (excessive heat or cold)?
13. Unsecured loads, usually associated with a move (e.g., loading pipe on a truck, moving with a crane)?

The dropped object calculator can be accessed using the hyperlink: [Dropped Object Calculator](#)

**Note:** The Risk Matrix in the [EHS Risk Management Protocol](#) and [SIF Investigation and Review SOP](#) are additional tools that may be used for SIF determination.

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SIF Near Miss is based on what the potential outcome of the event could have been. SIF Near Miss is an event that could have realistically resulted in a life-threatening injury/illness, life-altering injury/illness, or fatality where there was no actual injury or illness.

### SIF Near Miss

If the event does not result in injury or illness and yes to any of the following, **very likely** event is SIF Near Miss. Did the event involve:

1. Uncontrolled release of energy (e.g., high pressure lines, cable tension, stored energy)?
2. Dropped object - heavy enough and high enough? See dropped object calculator below.
3. Heavy equipment operation (e.g., cranes, forklifts, backhoes, crown outs)?
4. Rotary equipment (e.g., pump jack, top drive, power swivels, power tongs (not grinders))?
5. Excavation (e.g., line strike, cave in, confined space entry)?
6. Electricity (e.g., control panels, overhead power lines, buried cables)?
7. Chemical exposure (e.g., IDLH, H<sub>2</sub>S, CO, HCL, acid spray)?
8. Fires or explosions?
9. Hydrocarbon or hazardous air releases?
10. Falls over 4' vertical (including stairs and ladders)?
11. Driving (Use Motor Vehicle determination tool)?
12. Exposure to temperature extremes (excessive heat or cold)?
13. Unsecured loads, usually associated with a move (e.g., loading pipe on a truck, moving with a crane)?

If yes to any of the following, very likely event is **not** SIF Near Miss. Did the event involve:

1. Fall from same level?
2. Hearing shift?
3. Particle in the eye?
4. Bites and stings?
5. Manual lifting?
6. Hand tools under manual force?
7. Small power tools, in most circumstances?

The dropped object calculator can be accessed using the hyperlink: [Dropped Object Calculator](#)

**Note:** The Risk Matrix in the [EHS Risk Management Protocol](#) and [SIF Investigation and Review SOP](#) are additional tools that may be used for SIF determination.

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Motor vehicle SIF determination must consider the driver of the vehicle, passengers, other vehicles as well as, pedestrians.

### Motor Vehicle SIF Actual

If yes to any of the following, event is SIF Actual. Did the event result in any of the following:

1. Life-threatening injury
2. Life-altering injury
3. Fatality

### Motor Vehicle SIF Potential

If event resulted in an injury (excluding life-threatening injury, life-altering injury, or fatality) and yes to any of the following, **very likely** there is SIF Potential. Did the event involve:

1. Proximity to vessels or lines?
2. Not aware of surroundings in public area?
3. Not aware of surroundings on job site and people working on location?
4. Loss of vehicle control (e.g., distracted, loss of traction)?
5. Cross traffic (e.g., in intersection, passing another vehicle)?
6. Seat belt not worn?
7. Vehicle rolled over?
8. Proximity to cliffs, water to submerge, power lines, chemicals etc.?
9. Head on Collision?

### Motor Vehicle SIF Near Miss

If yes to any of the following, **very likely** event is SIF Near Miss. Did the event involve:

1. Proximity to vessels or lines?
2. Not aware of surroundings in public area?
3. Not aware of surroundings on job site and people working on location?
4. Loss of vehicle control (e.g., distracted, loss of traction)?
5. Cross traffic (e.g., in intersection, passing another vehicle)?
6. Seat belt not worn?
7. Vehicle rolled over?
8. Proximity to cliffs, water to submerge, power lines, chemicals etc.?
9. Head on Collision?
10. Did "crash calculator" indicate SIF for any occupant?

The crash calculator can be accessed using the hyperlink: [Vehicle Crash Calculator](#)



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### Environmental Incident SIF

If yes to any of the following, **very likely** there is potential for SIF. Did the incident involve:

1. A loss of well control or backflow from disposal well into environment?
2. A spill that had the potential to or did affect a National Park, National Grassland, Conservation Area, or other environmentally sensitive area?
3. A spill that had the potential to or did reach and enter surface water or groundwater?
4. A spill that has the potential for legal consequence, regulatory penalty, or a material remediation cost?
5. An air release/spill that had the potential to or resulted in an evacuation or shelter-in-place, or could have harmed the public?

If yes to any of the following, very likely there is **not** SIF potential. Did the incident involve:

1. Spills and releases with a small, minimal amount of material being discharged?
2. Spills that were contained in secondary containment?
3. Releases to the air that would have dispersed and would have no negative impact to the public or facility workers?

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### APPENDIX B: EVENT CLASSIFICATION TABLE

Consequence	Class I	Class II	Class III	Class IV	Class V
<b>Employee / Contractor Injury / Illness</b>	First-aid case	Medical treatment only case, modified work, restricted duty, or job transfer	Injury or illness that results in days away	Permanently disabling injury	Multiple permanently disabling injuries or single fatality
<b>Environmental Impact</b>	Spill >1 and <20 barrels OR <i>Unplanned release of gas or vapor that is reportable to a Regulatory Agency</i>	Spill that is ≥ 20 barrels but ≤ 100 barrels OR <i>Unplanned release of gas or vapor that is reportable to a Regulatory Agency and has the potential to impact offsite receptors</i>	Spill that is > 100 barrels but ≤ 500 barrels OR Reportable to a Regulatory Agency and does not cause adverse environmental impact OR <i>Unplanned release of gas or vapor that is reportable to a Regulatory Agency and results in the emergency shutdown of a plant and/or multiple facilities</i>	Spill that is > 500 barrels but ≤ 1,000 barrels OR Reportable to a Regulatory Agency and causes environmental impact, or impacts a water body, surface water or groundwater OR <i>Unplanned release of gas or vapor that negatively impacts the public or worker safety</i>	Spill > 1,000 barrels OR Causes adverse environmental impact OR <i>Unplanned release of gas or vapor that negatively impacts multiple public receptors, requires evacuations, or impacts worker safety</i>
<b>Motor Vehicle Incident</b>	Vehicle damage ≤ \$5,000	Vehicle damage > \$5,000 and ≤ \$10,000	Vehicle damage > \$10,000 and ≤ \$50,000	Vehicle damage > \$50,000 and ≤ \$75,000	Vehicle damage > \$75,000
<b>Property Damage</b>	Property damage ≤ \$25,000	Property damage > \$25,000 and ≤ \$250,000	Property damage > \$250,000 and ≤ \$2.5 MM	Property damage > \$2.5 MM and ≤ \$25 MM	Property Damage > \$25 MM
<b>Regulatory Response (For Non-Compliance Event)</b>	No regulatory agency notification	Inform notification to regulatory agency	Regulatory agency notification, regulatory enforcement, NOV or non-compliance	Regulatory agency notification, multi facility NOV or non-compliance or shut-in enforcement at a single facility or formal charges	Notification to regulatory agency and shut-in enforcement at multiple facilities, or formal charges of executive or company officers, or refusal of future applications or licenses
<b>Public Receptors</b>	No media attention likely	Local media attention possible	Local media attention, possible state media attention	State media attention with possible regional / national media attention	National media attention
<b>Business Interruption</b>	Mitigated without activation of facility emergency response plan	Results in a fire or required facility emergency response plan	Facility emergency response plan activation with outside mutual aid	Emergency response plan activation with outside mutual aid	Outside mutual aid, corporate business interruption

<div> <div>devon</div> <div>Event Reporting and Investigation Protocol</div> </div>			
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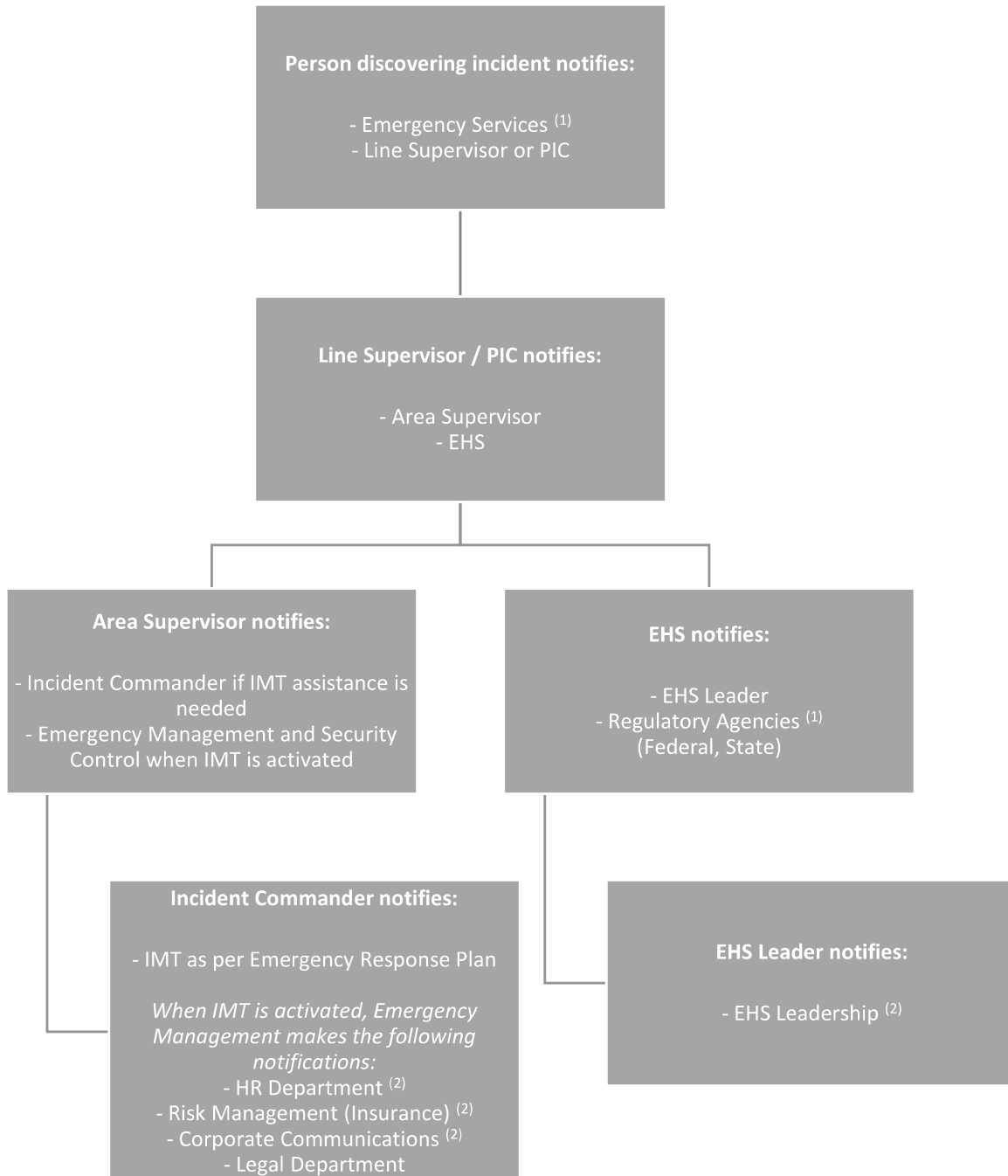
## APPENDIX C: INTERNAL NOTIFICATION REQUIREMENTS BASED ON EVENT CLASS



# Event Reporting and Investigation Protocol

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## APPENDIX D: NOTIFICATION FLOW CHART



<sup>(1)</sup> Notification made when required.

<sup>(2)</sup> Notification made when appropriate.



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### APPENDIX E: EXTERNAL REPORTING NOTIFICATION REQUIREMENTS

Federal Occupational Safety and Health Administration (OSHA)			
What to Report	When to Report	How to Report	
<ul style="list-style-type: none"><li>• Work-related employee fatality</li><li>• Work-related employee inpatient hospitalization, amputation, or loss of an eye</li></ul>	Within 8 hours	<ul style="list-style-type: none"><li>• Call the nearest area <a href="#">OSHA office</a></li></ul>	
	Within 24 hours	<ul style="list-style-type: none"><li>• Call the OSHA 24-hour hotline at 1-800-321-6742 (OSHA)</li><li>• Report using the <a href="#">online form</a></li></ul>	

Bureau of Land Management (BLM) – United States		
What to Report	When to Report	How to Report
<p><u>Major undesirable events</u></p> <ul style="list-style-type: none"><li>• Oil, saltwater, or toxic liquid spills, or any combination thereof, which results in the discharge (spilling) of 100 or more barrels of liquid; however, discharges of such magnitude, if entirely contained within the facility firewall, may be reported only in writing</li><li>• Equipment failures or other accidents which result in the venting of 500 MCF, or more, of gas</li><li>• Any fire which consumes the volumes of oil, saltwater, toxic liquid, or gas as specified in the ranges described in the two bullet points above</li><li>• Any spill, venting, or fire, regardless of the volume involved, which occurs in a sensitive area, such as parks, recreation sites, wildlife refuges, lakes, reservoirs, streams, or urban or suburban areas</li><li>• Each accident which involves a fatal injury</li><li>• Every blowout (loss of control of any well) that occurs</li></ul>	<ul style="list-style-type: none"><li>• Initial notice within 24 hours</li><li>• Follow-up written report within 15 days</li></ul>	<ul style="list-style-type: none"><li>• Call to the appropriate District Engineer</li><li>• Follow-up written report to the District Engineer</li></ul>



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<p><u>Other than major undesirable events</u></p> <ul style="list-style-type: none"><li>Oil, saltwater, or toxic liquid spills, or any combination thereof, which results in the discharge (spilling) of at least 10 but less than 100 barrels of liquid in non-sensitive areas, and all discharges of 100 or more barrels when the spill is entirely contained by the facility firewall</li><li>Equipment failures or other accidents which result in the venting of at least 50 but less than 500 MCF of gas in non-sensitive areas</li><li>Any fire which consumes volumes of oil, saltwater, toxic liquid, or gas as specified in the ranges described in the two bullet points above</li><li>Each accident involving a major or life-threatening injury</li><li>Spills or discharges in non-sensitive areas involving less than 10 barrels of liquid or 50 MCF of gas do not require an oral or written report; however, the volumes discharged or vented as a result of all such minor incidents must be reported in accordance with the Monthly Report of Operations/Monthly Report of Sales and Royalty</li></ul>	Within 15 days	<ul style="list-style-type: none"><li>Written report submitted to the appropriate District Engineer</li></ul>
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### U.S. Department of Transportation (DOT) – Transportation of Natural and Other Gas by Pipeline (Part 192)

Refer to the <a href="#">Devon DOT Natural Gas Pipeline Procedural Manual</a> for detailed reporting requirements on regulated natural gas pipelines.		
What to Report	When to Report	How to Report
<ul style="list-style-type: none"><li>Following confirmed discovery, operator must give notice of any of the following events:<ul style="list-style-type: none"><li>Event that involves a release of gas from a pipeline subject to Part 192 that results in one or more of the following:<ul style="list-style-type: none"><li>Death, or personal injury requiring in-patient hospitalization</li><li>Estimated property damage according to current PHMSA property damage threshold criteria published on PHMSA's website</li></ul></li></ul></li></ul>	Within 1 hour	<ul style="list-style-type: none"><li>Call the NRC at 800-424-8802</li><li>Electronically on EPA website</li></ul>



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<ul style="list-style-type: none"><li>▪ Unintentional estimated gas loss of 3 million cubic feet or more<ul style="list-style-type: none"><li>○ Event that is significant in the judgement of the operator, even though it did not meet the criteria listed in the bullet points above</li></ul></li></ul>			
<ul style="list-style-type: none"><li>• Revise or confirm initial telephonic notice for events listed in the first row of this table</li></ul>	Within 48 hours		<ul style="list-style-type: none"><li>• Call the NRC at 800-424-8802</li><li>• Electronically on EPA website</li></ul>
<ul style="list-style-type: none"><li>• Operator of regulated onshore gathering pipeline (Type A, B, and C) must submit incident report for events listed in the first row of this table</li></ul>	Within 30 days		<ul style="list-style-type: none"><li>• Electronically on PHMSA Portal on <a href="#">DOT Form PHMSA 7100.2</a></li></ul>
<ul style="list-style-type: none"><li>• Operator of reporting regulated gathering pipeline (Type R) must submit incident report for events listed in the first row of this table</li></ul>	Within 30 days		<ul style="list-style-type: none"><li>• Electronically on PHMSA Portal on <a href="#">DOT Form PHMSA 7100.2-2</a></li></ul>
<ul style="list-style-type: none"><li>• Safety-related condition (excluding any accident above which is required to be reported) of Type A, B, or C (only greater than 12.75" for Type C) and that is less than 220 yards from any building intended for human occupancy or outdoor place of assembly and that has not been corrected by repair or replacement before the deadline for filing safety-related condition report involving any of the following:<ul style="list-style-type: none"><li>○ For pipelines that operate at a hoop stress of 20% or more SMYS, general corrosion that has reduced the wall thickness to less than that required for the maximum allowable operating pressure, and localized corrosion pitting to a degree where leakage might result</li><li>○ Unintended movement or abnormal loading of a pipeline by environmental causes (earthquake, etc.)</li><li>○ Any material defect or physical damage that impairs the serviceability of a pipeline that operates at a hoop stress of 20% or more SMYS</li></ul></li></ul>	Within 5 working days after operator first determines condition exists, but not later than 10 working days after operator discovers condition		<ul style="list-style-type: none"><li>• Email to DOT (see 191.25 for requirements)</li><li>• Applicable State agency</li></ul>



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<ul style="list-style-type: none"><li>○ Any malfunction or operating error that causes the pressure to exceed the MAOP</li><li>○ A leak in a pipeline that constitutes an emergency</li><li>○ Any safety-related condition that could lead to an imminent hazard and causes a 20 percent or more reduction in operating pressure or shutdown of operation of a pipeline</li></ul>	
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### U.S. Department of Transportation (DOT) – Transportation of Hazardous Liquids (Part 195)

Refer to the [Devon DOT Hazardous Liquids Pipeline Procedural Manual](#) for detailed reporting requirements on regulated hazardous liquids pipelines.

What to Report	When to Report	How to Report
<ul style="list-style-type: none"><li>● Following confirmed discovery of a release of hazardous liquid or carbon dioxide, operator must give notice of any failure in a pipeline system subject to Part 195 resulting in any of the following:<ul style="list-style-type: none"><li>○ Caused a death or a personal injury requiring hospitalization</li><li>○ Resulted in either a fire or explosion not intentionally set by the operator</li><li>○ Caused estimated property damage, including cost of cleanup and recovery, value of lost product and damage to the property of the operator or others, or both, exceeding \$50,000</li><li>○ Resulted in pollution of any stream, river, lake, reservoir, or other similar body of water that violated applicable water quality standards, caused a discoloration of the surface of the water or adjoining shoreline, or deposited a sludge or emulsion beneath the surface of the water or upon adjoining shorelines</li></ul></li><li>○ In the judgment of the operator was significant even though it did not meet the criteria listed in the bullet points above</li></ul>	Within 1 hour	<ul style="list-style-type: none"><li>● Call the NRC at 800-424-8802</li><li>● Electronically on EPA website</li></ul>





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<ul style="list-style-type: none"><li>• Revise or confirm initial telephonic notice for events listed in the first row of this table</li></ul>	Within 48 hours	<ul style="list-style-type: none"><li>• Call the NRC at 800-424-8802</li><li>• Electronically on EPA website</li></ul>
<ul style="list-style-type: none"><li>• Failure in a pipeline system subject to Part 195 where there is a release of hazardous liquid or carbon dioxide resulting in any of the following:<ul style="list-style-type: none"><li>○ Explosion or fire not intentionally set by operator</li><li>○ Release of more than 5 gallons (19 liters) or more of hazardous liquid or carbon dioxide</li><li>○ Death of any person</li><li>○ Personal injury requiring hospitalization</li><li>○ Estimated property damage, including cost of clean-up and recovery, value of lost product and damage to the property of the operators or others, or both, exceeding \$50,000</li></ul></li></ul>	Within 30 days	<ul style="list-style-type: none"><li>• File an accident report on <a href="#">DOT Form 7000-1</a></li></ul>
<ul style="list-style-type: none"><li>• Safety-related condition (excluding any accident above which are required to be reported) and that is less than 220 yards from any building intended for human occupancy or outdoor place of assembly and that has not been corrected by repair or replacement before the deadline for filing safety-related condition report involving any of the following:<ul style="list-style-type: none"><li>○ General corrosion that has reduced the wall thickness to less than that required for the maximum operating pressure, and localized corrosion pitting to a degree where leakage might result</li><li>○ Unintended movement or abnormal loading of a pipeline by environmental causes (earthquake, etc.)</li><li>○ Any material defect or physical damage that impairs the serviceability of a pipeline</li></ul></li></ul>	Within 5 working days after operator first determines condition exists, but not later than 10 working days after operator discovers condition	<ul style="list-style-type: none"><li>• Email to DOT (see Part 195.56 for requirements)</li><li>• Applicable State agency</li></ul>



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<ul style="list-style-type: none"><li>○ Any malfunction or operating error that causes the pressure of a pipeline to rise above 110 percent of its maximum operating pressure</li><li>○ A leak in a pipeline that constitutes an emergency</li><li>○ Any safety-related condition that could lead to an imminent hazard and causes a 20 percent or more reduction in operating pressure or shutdown of operation of a pipeline</li></ul>	
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### U.S. Federal Aviation Administration (FAA)

What to Report	When to Report	How to Report
<ul style="list-style-type: none"><li>● If an emergency has the possibility of affecting aviation traffic, local law enforcement agencies have the authority to notify the FAA and request a temporary flight restriction for the area</li></ul>	As soon as possible	<ul style="list-style-type: none"><li>● Call 866-835-5322</li></ul>

### U.S. National Response Center (NRC)

What to Report	When to Report	How to Report
<ul style="list-style-type: none"><li>● A release of oil or a hazardous substance to navigable waters</li><li>● A release of a hazardous substance to air in excess of the reportable quantity listed in 40 CFR §302.4 Comprehensive Environmental Response Compensation, and Liability Act (CERCLA) hazardous substances are identified and regulated under 40 CFR Part 302</li></ul>	Immediate notification	<ul style="list-style-type: none"><li>● Call the NRC at (800) 424-8802 or (202) 267-2675</li><li>● Electronically on EPA website</li></ul>

### Chemical Safety Board (CSB)

What to Report	When to Report	How to Report
<ul style="list-style-type: none"><li>● Any release of an unanticipated emission of a regulated substance or other extremely hazardous substance into the ambient air from a stationary source resulting in:<ul style="list-style-type: none"><li>○ Fatality</li></ul></li></ul>	<ul style="list-style-type: none"><li>● Within 30 minutes if owner or operator has submitted a report to the NRC</li></ul>	<ul style="list-style-type: none"><li>● Report made on <a href="#">CSB Form</a> by email to <a href="mailto:report@csb.gov">report@csb.gov</a></li><li>● Telephone at 202-261-7600</li></ul>



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<ul style="list-style-type: none"><li>○ Serious injury: inpatient hospitalization</li><li>○ Substantial property damage: estimated property damage at or outside the stationary source equal to or greater than \$1,000,000</li></ul>	<ul style="list-style-type: none"><li>• Within 8 hours if no report has been submitted to the NRC</li></ul>	
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### State OSHA – New Mexico

What to Report	When to Report	How to Report
<ul style="list-style-type: none"><li>• Work-related employee fatality</li></ul>	Within 8 hours	<ul style="list-style-type: none"><li>• Call (505) 476-8700 (State Office)</li></ul>
<ul style="list-style-type: none"><li>• Work-related employee in-patient hospitalization, amputation, or loss of an eye</li></ul>	Within 24 hours	

### State OSHA – Wyoming

What to Report	When to Report	How to Report
<ul style="list-style-type: none"><li>• Work-related employee fatality</li></ul>	Within 8 hours	<ul style="list-style-type: none"><li>• Call (307) 777-7786 (State Office)</li></ul>
<ul style="list-style-type: none"><li>• Work-related employee in-patient hospitalization, amputation, or loss of an eye</li></ul>	Within 24 hours	

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## APPENDIX F: FIRST AID TREATMENT LIST

The following treatments are considered first aid; all other treatments are considered medical treatment and will be recorded as such:

- Using a non-prescription medication at non-prescription strength (for medications available in both prescription and non-prescription form, a recommendation by a physician or other licensed health care professional to use a non-prescription medication at prescription strength is considered medical treatment for recordkeeping purposes)
- Administering tetanus immunizations (other immunizations, such as Hepatitis B vaccine or rabies vaccine, are considered medical treatment)
- Cleaning, flushing or soaking wounds on the surface of the skin
- Using wound coverings such as bandages, Band-Aids™, gauze pads, etc.; or using butterfly bandages or Steri-Strips™ (other wound closing devices such as sutures, staples, etc., are considered medical treatment)
- Using hot or cold therapy
- Using any non-rigid means of support, such as elastic bandages, wraps, non-rigid back belts, etc. (devices with rigid stays or other systems designed to immobilize parts of the body are considered medical treatment for recordkeeping purposes)
- Using temporary immobilization devices while transporting an accident victim (e.g., splints, slings, neck collars, back boards, etc.)
- Drilling of a fingernail or toenail to relieve pressure, or draining fluid from a blister
- Using eye patches
- Removing foreign bodies from the eye using only irrigation or a cotton swab
- Removing splinters or foreign material from areas other than the eye by irrigation, tweezers, cotton swabs or other simple means
- Using finger guards
- Using massages (physical therapy or chiropractic treatment are considered medical treatment for recordkeeping purposes); or
- Drinking fluids for relief of heat stress.

**Note:** The following are not considered medical treatment for record keeping purposes:

- Visits to a physician or other licensed health care professional solely for observation or counseling
- The conduct of diagnostic procedure, such as x-rays and blood test, including the administration of prescription medications used solely for diagnostic purposes (e.g., eye drops to dilate pupils)

Additional information, including interpretations, on OSHA Recordkeeping requirements can be found on OSHA's Recordkeeping website. <https://www.osha.gov/recordkeeping/index.html>

List of first aid treatments from OSHA 1904.7(b)(5)(ii)

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## APPENDIX G: CONTRACTOR INJURY/ILLNESS METRIC RECORDING GUIDE

Contractors have the primary responsibility to classify their work-related injuries. If the contractor and Devon do not agree on the injury classification, Devon will record the injury internally in accordance with the established record keeping requirements.

While there are many different types of personnel on location at various times, certain types and certain contractor activities are excluded from the internal recording requirements. Those exclusions include the following:

- Personnel who do not charge time or labor (e.g., supply delivery, non-Devon contractors)
- Vending machine stock and repair personnel
- Delivery drivers (e.g., UPS, FedEx)
- Product haulers (e.g., oil, condensate) who are under the contract of the purchaser
- Contractors traveling on public roadways
- Public utility or midstream company employees working on their equipment that is on or at our locations (e.g., power, water, phone, gas)
- Personnel who are trespassing on Devon property

**Note:** A formal style investigation should be initiated for SIF events that occur on Devon locations with personnel who are excluded from the internal recording requirements.

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## **APPENDIX H: CONTRACTOR SIF INVESTIGATION MANAGEMENT REVIEW GUIDELINES**

Please provide the following information in an electronic format (PowerPoint preferred, Microsoft Word acceptable) regarding the incident. Please note that the presentation needs to be in a presentable, straight forward format. The requested format can be found below and should contain these elements.

### **1. Title Page**

- May include any descriptive title for the incident. Also, a company logo can be used.

### **2. Initial Incident Notification**

- An initial description of the event and action used to control the situation. This can contain information that is found to be erroneous or incomplete later in the investigation. It is basically what was known in the first 15 minutes of the event.

### **3. Sequence of Events**

- This can be either a narrative or bullet point format.

### **4. Photographs and /or Diagrams (if applicable)**

- Any relevant photos of the area or the incident (should be clarified with visual aids, arrows, markers as necessary).

### **5. Employee / Witness Statements (if applicable)**

- Should include person's name, job title, date statement was taken.

### **6. Other Reviewed Information (if applicable)**

- Any documents, JSAs, SOPs, training, licenses, scope of work, standing orders.
- Please ensure that the JSA is a copy of the actual JSA performed/signed prior to the work beginning.
- Has there been any similar incidents within your company? If so, please provide a copy of the investigation(s) and what corrective actions were identified along with a status of implementation.

### **7. Contributing Factors (if applicable)**


- Any circumstances that impacted the incident (e.g., weather, fatigue, equipment problems, etc.).

### **8. Root Cause**

- A root cause is an initiating cause of a causal chain which leads to an outcome or effect of interest.

### **9. Corrective Actions**

- Must consider the hierarchy of controls (engineered, administrative, or human), and have a person (by name) that they are assigned to, and a due date. An investigation that yields only human performance corrective actions needs to be re-evaluated until a more substantial control (engineered, eliminated, administratively controlled) can be found. There must be a corrective action for each root cause identified (if more than one).

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## APPENDIX I: REPORTING AND REMEDIATION GUIDANCE FOR CRUDE OIL / CONDENSATE / PRODUCED WATER SPILLS

Contractor spills oil / produced water on our site			
Product	Agency Reporting	Internal Reporting	Metric
Oil purchased at our location	Responsibility of Contractor if they purchased oil at our site	Will go into our system as property damage regardless of volume	Responsibility of Contractor Will not be counted on our spills / volume / lost
Oil being transported by contractor	Responsibility of Devon to report	Will go into the event reporting/investigation system as a spill	Responsibility of Contractor Will be counted against our spills / volume / lost
Produced Water	Responsibility of Devon to report	Will go into the event reporting/investigation system as a spill	Responsibility of Contractor Will be counted against our spills / volume / lost
Contractor spills oil / produced water on other's ground – away from our site			
Product	Agency Reporting	Internal Reporting	Metric
Oil purchased at our location	Responsibility of Contractor if they purchased oil at our site	Will not go into the event reporting/investigation system as a spill	Responsibility of Contractor Will not be counted on our spills / volume / lost
Oil being transported by contractor	Responsibility of contractor to report to DOT and Devon to report to Commissions / Env Agencies	Will go into the event reporting/investigation system as a spill	Responsibility of Contractor Will be counted against our spills / volume / lost
Produced Water	Responsibility of Contractor	Will not go into the event reporting/investigation system as a spill	Responsibility of Contractor Will not be counted on our spills / volume / lost



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### APPENDIX J: SPILL CAUSE DEFINITIONS

Spill Cause	Cause Definition	Examples
<b>Physical Access to Area</b>	Physical access to the equipment and/or facility was not available due to uncontrolled issue resulting in an event.	Pad sits on one side of a creek and large rainstorm prevents access across the creek and to the location.
<b>Human Error</b>	Poor human performance related to error, intentional rule violation and/or lack of situational awareness that the individual should have otherwise known or planned for.	While packing well, lease operator leaves valve open and well releases pressure, transfer pump is left on and continues to pump into mud tank and it overflows, lease operator leaves valve on the circulating pump open to atmosphere when pump kicks on and it causes a release.
<b>Mechanical Failure</b>	Equipment failure that occurs when the equipment was properly designed, used, and maintained, yet fails to perform as expected.	LACT unit pump housing cracks multiple times in a row despite following the manufactures specifications; abnormal metallurgy issues cause by manufacturing process.
<b>Erosion</b>	The process of physically eroding or being eroded by wind, water, sand, or other agents (external and internal) during normal or expected operating conditions; the loss of material as a result of high velocity flow (external and internal).	Sand in fluid that eventually compromises piping (e.g., sand cutout); pressed piping where fluid cuts or erodes away at raised lips inside the pipe caused by the press grooving process; pipe laying on ground and through vibration it wears thin.
<b>Corrosion</b>	The breaking down, degrading and/or destruction of a material, especially a metal, through chemical reactions; the destructive result of chemical reaction between a metal or metal alloy and its environment that creates a metal loss.	Piping in secondary containment is damaged by sitting in standing water, galvanic corrosion (e.g., a bull plug on a fiberglass tank is poorly grounded and the becomes unintentionally sacrificial).
<b>Practices and Protocols</b>	Practices and protocols that would have prevented the event from occurring are not written, available or	New facility or equipment that is put into service without proper knowledge transfer or training on operation of the equipment.



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	are written but determined not adequate.	
<b>Resource Availability</b>	Materials, staff, or other resources that are not committable, operable, or useable upon demand.	When a spill is imminent, and enough notice is given, however resources (trucks, etc.) are not available to respond.
<b>Natural Disaster/Weather</b>	Natural occurring event that could not be reasonably protected against by facility design, maintenance and/or operation.	Spills resulting from tornados, hurricanes, thunderstorms, earthquakes (non-lightning related only).
<b>Lightning</b>	Electrostatic discharge that occurs during a thunderstorm.	Lightning strike to equipment.
<b>Inadequate Design</b>	When installation and maintenance is adequate, and the major contributing factor is design.	Well surges, over running tank 1 and the root cause is determined that the spill over lines were not adequately designed to keep up with peak flow; dump is too small to keep up with production and swamps out the separator which then sends fluids to the flare, facility supply gas for the dumps is ran off of one inlet separator and the well slugs and loses gas causing all the dump valves in the vicinity to stop working which causes all the vessels to swamp out and fluids are lost out of the flare.
<b>Incompatible Materials</b>	Materials utilized cannot withstand the chemicals or materials that it will be exposed to regularly.	Equipment seals deteriorate due to reaction with produced liquids and/or chemicals in produced fluids.
<b>Wellbore Communications</b>	Ability to detect pressure variations and fluid flows between wellbores during hydraulic fracturing.	Offset well bore completions affects producing wellbore.
<b>Electronic Communications Failure</b>	When the ability to monitor onsite equipment and operating parameters is lost.	Power outages causing loss of communication, including server issues.
<b>Freezing</b>	Equipment failure that occurs when the equipment was used and maintained but fails due to expansion stress caused by freezing temperatures.	Fluid inside valves, fittings and pipe freezes, and the resulting expansion causes the component to fail.



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<b>Overpressure</b>	Pressure that is significantly above what is expected, usual and/or normal; pressure that exceeds the design of the containment.	Flowlines are locked out on well pad for maintenance and a casing valve is left open causing pressure to rise in the flow lines and causing the lines to rupture, fluid escapes from the thief hatch because the design pressure was exceeded.
<b>Vandalism</b>	Action involving deliberate destruction or damage to property.	Illegal dumping events, location equipment is intentionally damaged or tampered with and results in a release, flowline is damaged/shot on public lands.



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### ATTACHMENT A: APPROVAL, REVIEW AND MODIFICATION HISTORY

[Event Reporting and Investigation Protocol Approval, Review and Modification History](#)