

ATTACHMENT C.4
SYU LFC INTERIM TRUCKING
CRUDE OIL TRANSPORTATION RISK MANAGEMENT AND
PREVENTION PROGRAM (CO-TRMPP)

1.0 Introduction and Objective

ExxonMobil's Santa Ynez Unit Facility (SYU) finalized permitted and construction and began operations in 1993. Since that time, all crude oil export has occurred via the Plains All American Pipeline Line 901 and 903 (PAAPL) which is connected to the LFC facilities at the LFC Transportation Terminal. In May 2015, the PAAPL Line 901 pipeline experienced an incident where a failure resulted in the shutdown of both Line 901 and 903 that SYU utilized to transport crude to refineries.

ExxonMobil is submitting the SYU LFC Interim Trucking application to allow production operations to re-start at the Santa Ynez Unit following shutdown of the PAAPL pipeline and subsequent preservation of the SYU facilities. The application requests operation of interim trucking until a pipeline alternative is available. The interim trucking facilities would be located in Las Flores Canyon (LFC) approximately twelve (12) miles west of Goleta and consist of the activities described in Attachment A.3 Description..

All highway transportation from LFC will be limited to State Highway 101; no truck traffic will be directed through State Highway 154. Transportation in urban areas will be limited to the extent feasible.

Truck loading and transportation operations would occur seven days a week, 24-hours per day except as noted below. After unloading at one of the designated facilities, the trucks could return directly back to LFC to reload or they could be reassigned to other operations.

This Crude Oil Transportation Risk Management and Prevention Program (CO-TRMPP) has been developed to ensure that the interim trucking is conducted in a safe and efficient manner.

2.0 Elements of the CO-TRMPP

The CO-TRMPP shall apply to any and all highway shipments of product from ExxonMobil's SYU facility in Las Flores Canyon to the regional receiving locations as part of the LFC interim trucking.

Product carriers shall be required to complete the "Crude Oil - Motor Carrier Safety Survey" (Exhibit A) prior to starting shipments from LFC. LFC Operations personnel will verify that each carrier meets or exceeds the safety standards. LFC Operations personnel will also conduct a safety and operability inspection (checklist) of trucks prior to loading and prior to transport from LFC. Any truck that receives an unsatisfactory inspection will no longer be permitted to transport product until the issue has been corrected.

LFC Operations has also developed a procedure for the trucks to follow during the truck loading. If, based on ExxonMobil operator observations, the carrier's actual performance in loading at LFC is inconsistent with the Safety Survey, safety inspection, or the procedure, ExxonMobil will re-evaluate the carrier's ability to safely load and haul product. If the issues cannot be resolved to demonstrate the carrier's ability to safely load and haul product, use of that carrier will be discontinued until they successfully satisfy ExxonMobil's requirements.

There are no specific, pre-established criteria for terminating use of a carrier insofar as there are potentially many different situations in which ExxonMobil may decide to take such action. For the most part, this decision will be based on operational and technical judgment made by LFC operating and engineering personnel after reviewing the facts of the situation at that time. In general, any human or mechanical issues that pose the potential to compromise safe operations will be cause for discontinuing use of any carrier until such issues are resolved to ExxonMobil's satisfaction.

An ExxonMobil operator will be present during the loading activities. The operators will be trained prior to commencing loading operations and what to inspect using the developed procedure and checklist. The operator will advise his or her supervisor if there is an issue with the truck or driver. If an issue is observed prior to loading, the truck will not be loaded and the carrier's dispatcher will be notified to correct the issue before the truck will be loaded or to send another truck. If an issue is discovered after a truck is loaded (e.g., overload, leak), the driver will be instructed not to leave LFC until the issue is corrected.

In addition to the ExxonMobil LFC company compliance plans, the selected carrier will have compliance plans in place to respond to accidents and other incidents such as listed below:

- Emergency Action Plan
- Spill Prevention Emergency Response Containment Plan
- Incident Investigation and Reporting Policy
- Incident Reporting Flow Chart

ExxonMobil will include provisions in its contracts with each carrier to require a number of safety and operational requirements. The requirements are included in the Crude Truck Loading Procedure and the LFC Site Specific Safety Training for All Truck Drivers.

A number of the safety and operational requirements are summarized below (Reference Crude Transport Truck Driver Training):

Required Pre-Mobilization Training Requirements

- o Carrier(s) Driver Orientation and Passport Safety Training
- o ExxonMobil Las Flores Canyon Site Specific Training
- o LFC Crude Transport Truck Driver Training

Required Clothing and PPE for Drivers in LFC:

- o Compliance with Facial Hair Policy
- o FRCs (Coveralls or Long Sleeve Shirt and Long Pants)
- o Sturdy Steel-Toed Work Boots
- o Safety Glasses/Goggles, Impact Resistant Gloves, and Hardhat
- o Personal H₂S Monitor
- o Earplugs

Reminders:

- Smoking not allowed when within LFC
- Zero tolerance for Alcohol / Drugs / Firearms – Do not bring on site; Subject to random search
- No liquids (e.g., water, coffee, etc.) allowed to be poured on the ground when within LFC

Truck Restrictions:

- Truck equipped with operating speed monitoring system
- Truck trailer empty when arriving at LFC per contract
 - Trailers used for The LFC interim trucking exclusively dedicated to crude oil transportation service
 - Trailer empty prior to loading
- Truck/Trailer placards in accordance with DOT regulations
- Crude Oil Safety Data Sheet (SDS) in Truck
- Crude Transport Truck Driver Training document in Truck
- Maximum Truck/Trailer height cannot exceed 13.5 feet
- Maximum Truck/Trailer weight with full load cannot exceed 80,000 pound limit

Truck Route Restrictions

- Routes to and from LFC restricted
 - Use of Hwy 101 El Capitan Beach exit not allowed
- Truck operations to occur 24-Hours per day, 7 days per week
 - Exception: All trucks involved in the LFC interim trucking will observe a curfew when travelling on Calle Real if deemed appropriate. Truck traffic will not travel on Calle Real between El Capitan exit and Refugio exit during the hours of 7:45 am to 8:30 am and 2:55 pm to 3:40 pm. This restriction only applies when the school is in regular operation and students are being bussed.

Driving in LFC

- Protected species known to be on site
 - Do not approach, harass or intentionally harm any wildlife
- Watch for wildlife on and adjacent to road: Avoid where safe to do so; All wildlife is protected on site. Includes deer, rabbits, foxes, bobcats, frogs, turtles, etc.
- Report observations of injured, dead or potentially dangerous wildlife to ExxonMobil representative
- Truck speed limit within LFC is 15 MPH – no exceptions
- Watch for oncoming traffic. Some areas of the road are narrow and have blind curves
- Watch for directional signs to Weigh Area, Holding Area, and Loading Area

- Drivers to have an operating cell phone; Phone use prohibited within LFC facility (includes driving, waiting or loading)

EXHIBIT A - Crude Oil - Motor Carrier Safety Survey

EXHIBIT A
Crude Oil- Motor Carrier Safety Survey
Santa Ynez Unit Facility

General Information

Interview Location _____

Carrier Personnel Interviewed _____

Date of Interview _____

Equipment: No. of tractors owned by Company/Operator _____

Replacement Policy for Tractors _____

No. of trailers/tanks owned by Company/Operator _____

Replacement Policy for Tanks/Trailers _____

No. of Drivers _____

Company Safety Indicators

a. DOT reportable accident rate per million vehicle miles: _____

b. Insurance premium cost per one hundred dollars of gross receipts: _____

c. Insurance Carriers _____

d. Liability Limits _____

e. Deductible _____

f. Does your insurance extend to subhaulers? _____

g. Current Bureau of Motor Carrier Safety (BMCS) rating _____

h. Date of last BMCS Safety Survey _____

i. Type of BMCS Violations Recorded _____

j. Citations/fines, if any, by Department of Transportation during past 3 years.

Company Drivers

- a. Minimum Years Driving Experience _____
- b. Physical Examination Required? _____
- c. Number of Moving Violations permitted _____
- d. Number of reportable accidents permitted _____

Driver Training

- a. Length of New Driver Training _____
- b. Frequency of Existing Driver Training _____
- c. Type of Training Used (Circle those that apply): Lecture Video Literature
- d. Training Administered by: Company Staff Driver/trainer Professional Firm
- e. Records of training maintained for each driver?

f. Training Topics Covered	Yes	No
1. Speeding Policy	_____	_____
2. Alcohol/narcotics/ drug abuse	_____	_____
3. Hazardous Materials	_____	_____
4. Placarding	_____	_____
5. Emergency Procedures	_____	_____
6. Emergency Communications	_____	_____
7. Rail/highway crossing procedures	_____	_____
8. Vehicle Inspections	_____	_____
9. Drivers Logs	_____	_____
10. Loading/bracing/blocking	_____	_____
11. Site Safety Rule Policy	_____	_____
12. Bulk Truck Specifics		
i. Loading/Unloading	_____	_____
ii. Equipment Operation	_____	_____
iii. Equipment Inspection	_____	_____
iv. Emergency Response	_____	_____

Driver Management

- a. Do you have a speed limit policy? If so, summarize.

- b. Do you have automated speed controls on trucks? If so, summarize.

- c. Do you use remote electronic monitoring of driver performance? If so, summarize.

- d. Are drivers required to report traffic violations? If so, summarize.

- e. Do you have policies for logging violations? If so, summarize.

- f. Do you have a method to allow for address public complaints? If so, summarize.

- g. Are passengers allowed in the truck cab? If so, summarize.

- h. Do you perform regular driver performance reviews, including safety compliance?

- i. Do you employ a full-time safety coordinator and or team?

Vehicle Inspections & Maintenance

a. Do you drivers conduct pre-trip inspections? If so, are records kept?

b. Do you drivers conduct post-trip inspections? If so, are records kept?

c. Are vehicle inspections and maintenance performed at an in-house facility or an outside professional repair facility?

d. At what frequency are the following tractor items proactively inspected/replaced?

- | | |
|---------------------------------|-------|
| 1. Steering Controls | _____ |
| 2. Brakes | _____ |
| 3. Safety/Emergency Equipment | _____ |
| 4. Lights | _____ |
| 5. Windshield Glass | _____ |
| 6. Engine Hoses | _____ |
| 7. Fluid Levels | _____ |
| 8. Tires | _____ |
| 9. Couplings/Air Hose Condition | _____ |
| 10. Fifth Wheel Lube/Locking | _____ |
| 11. Undercarriage | _____ |

e. Where and how often are visual inspections of tank trailers performed?

f. Where and how often are hydrostatic tests of tank trailers performed?
