



## 1.04(a) Contractors Responsibilities

---

### 1.0 PURPOSE

This purpose of this policy is to identify Coterra Energy Inc. (Coterra) contractor environmental, health and safety (EHS) expectations when working on a Coterra worksite.

### 2.0 SCOPE

This section applies to Coterra contractors.

### 3.0 DEFINITIONS

*Independent Contractor or Contractor:* An entity or individual whose personnel performs work on or at Coterra worksites pursuant to a Master Service Agreement or other approved contractual agreement. This includes subcontractors, vendors, agents, consultants or other persons under each contractor at the worksite. This does not include Coterra employees.

*Subcontractors:* An entity or individual whose personnel perform work on or at a Coterra facility or worksite on behalf of a contractor.

Additional definitions may be found in [4.12 Glossary of Terms](#).

### 4.0 POLICY

Coterra utilizes contractors in a wide variety of its operations and activities. Contractors must operate in a safe and environmentally responsible manner. This policy outlines Coterra's minimum EHS expectations relative to these contractors.

### 5.0 CONTRACTOR'S ROLES, RESPONSIBILITIES, AND ACCOUNTABILITIES

#### 5.1 Contractor

- Coterra utilizes contractors to perform many services. These contractors are to comply with this policy. However, this policy is not intended to address every possible service or work that a contractor could perform for Coterra. Moreover, contractors are responsible to provide appropriate safety equipment and training to its employees and the employees of any subcontractor as to exposures to safety risk. Contractors are also solely responsible for implementing and maintaining a safety program addressing the safety risks associated with the work or services that it is performing and that all safety measures be carried out by its employees or subcontractors.
  - **Subcontractors**  
Contractors must provide direct supervision of their employees and subcontractors. Any contractor who subcontracts work out, will hold said subcontractor to the same standards required of contractor, including the provision of insurance and other requirements contained in this section of the manual. This will be evidenced by an executed waiver of lien as outlined in the Master Service Agreement prior to work.

#### 5.2 Generally, Contractors are Responsible for:

- Insisting on safe and environmentally responsible performance throughout their operations by ensuring their employees and sub-contractor employees are competent to do their work properly.



### 1.04(a) Contractors Responsibilities

---

- Taking every reasonable precaution to protect themselves, others, and the environment from harm.
- Training their employees regarding the specific tasks they are contracted to carry out.
- Providing qualified, competent supervision during all aspects of the contractor's work.
  - An example of providing qualified supervision for contractor employees may be the implementation of a Short Service Employee (SSE) or a Career Advancement Program (CAP).
- Maintaining all equipment in such a manner as to ensure safe and environmentally protective operations.
- Reporting unsafe acts and conditions and any acts or conditions that may not satisfy applicable environmental requirements.
- Reporting all incidents or releases, regardless of size or severity, to the Coterra site representative immediately.
- Assessing the worksite and identify existing or potential EHS hazards before work begins.
- Providing the time and resources required to enable their employees to do their work properly.
- Complying with all obligations set forth in the Master Service Agreement or other agreements between Coterra and contractor.
- Complying with applicable statutory, regulatory or other requirements associated with the contractor's activities.
- Complying with all insurance requirements, including liability and workers' compensation requirements, including providing requested documentation regarding the satisfaction of these obligations with ISNetwork (ISN).
- Complying with the following ISN membership requirements:
  - Have and maintain EHS programs as approved through ISN Review and Verification Services (RAVS).
  - Ensure that their employees comply with the EHS programs set forth by their companies demonstrated by Training RAVS (TRAVS).
- Contractors must provide direct supervision of their employees and subcontractors. Any contractor who subcontracts work will:
  - Hold said subcontractor to the same standards required of contractor, including the provision of insurance and other requirements.
  - This will be evidenced by, among other things, an executed waiver of lien as outlined in the Master Service Agreement prior to work.

### 5.3 Confined Space Entry Program

- Contractor will inform their employees that they will be entering a Permit-Required Confined Space.
- Contractor will inform their employees of known potential hazards of the permit space.
- Contractor will inform their employees of precautions or procedures that they have implemented for protection of their employees.
  - Isolate the permit space as needed by using Lockout/Tagout (LOTO).
  - Contractor will develop an entry plan which will include methods for entry and non-entry rescue.
  - Contractor will continuously monitor the space for atmospheric hazards.



### 1.04(a) Contractors Responsibilities

---

- Coordinate entry operations with Coterra, as per [29CFR1910.146\(c\)\(9\)](#), when other affected personnel will be working near the permit space.
- Contractors are required to prepare their appropriate work permit documents (e.g. hot work permit, confined space permit, job safety & environmental analysis, etc.) prior to performing entry operations.
  - Adhering to the controls/safety measures identified in their permit(s).

#### 5.4 Control of Hazardous Energy

If a contractor is involved in LOTO operations supervised by Coterra personnel, the Coterra representative and the contractor's representative will inform each other of their respective energy control procedures and the contractor will follow the procedures of Coterra, provided that the contractor verifies that these procedures provide adequate protection to their employees, and meet or exceed the LOTO requirements of the contractor. When Coterra personnel are supervising LOTO operations the Coterra representative will accompany the contractor while the LOTO procedure is performed and will verify that the contractor's locks/tags are properly placed. The contractor and the Coterra representative will be present when any locks/tags are removed. This policy will not apply when Coterra personnel are not directly supervising the LOTO work of contractors.

Contractors are required to prepare their appropriate work permit documents (e.g. hot work permit, confined space permit, job safety & environmental analysis, etc.) prior to performing energy isolation.

- Adhering to the controls/safety measures identified in their permit(s).

#### 5.5 Electrical Safety

- Equipment
  - Installation of all electronic equipment should be performed by a qualified individual and the equipment should be kept in good working condition.
- Energized Parts
  - Only a qualified individual utilizing appropriate personal protective equipment (PPE), will work on or near exposed energized equipment.
- Confined Work Space
  - Contractors should not reach blindly into areas which contain energized parts.
  - Unqualified individuals shall not work in confined areas which might contain exposed energized parts.
- Material Handling
  - When a contractor must handle long dimensional conductive objects, such as pipe, in areas with energized parts, care must be taken to ensure contact is not made.

#### 5.6 Environmental Requirements

- Contractors are required to comply with all environmental laws, rules and regulations applicable to the specific location where work activities are being performed. Contractor shall maintain equipment to prevent releases. The contractor shall take appropriate measures to contain potential releases and promptly repair defective equipment.



### **1.04(a) Contractors Responsibilities**

- Contractor must not make any discharges to Waters of the United States that are not permitted or otherwise approved by law. In the event that the contractor performs a discharge under an applicable state permit or regulation, they must comply with all applicable requirements.
- Contractor must perform work in a manner that prevents effects of soil erosion and sedimentation in compliance with applicable laws, regulations, and permits. Clear and grade only areas necessary for construction and within the approved construction boundaries. Separate and replace topsoil in accordance with project requirements.
- Erosion and sediment control must be installed, inspected and maintained to contain soil on the construction site and away from road ways, wetlands and water bodies. Disturbed areas must be stabilized and re-vegetated where applicable, as soon as possible following construction in compliance with permit conditions and Coterra requirements or in accordance with landowner requirements.
- All contractors who meet the requirements for Spill Prevention Control and Countermeasure (SPCC) must comply with all plan requirements. The SPCC plan, if needed, must be made available for review to Coterra.
- In certain operating areas, as applicable, contractors shall adhere to no idling of diesel-powered equipment.

### **5.7 Environmental-Waste and Hazardous Waste Management**

- Contractor is responsible for the safe use and disposal of chemicals and hazardous materials brought onto a Coterra worksite in compliance with applicable laws and regulations, and for complying with the applicable requirements for generation of hazardous waste.
- Contractors that generate hazardous waste must comply with all regulations and other applicable laws. No hazardous waste may be disposed in Coterra waste containers. If there are questions, consult Coterra EHS personnel.

### **5.8 Excavating and Trenching Operations**

- Contractors performing below grade work tasks will prepare the worksite in accordance with established OSHA regulations and associated industry standards.
- A contractor who performs below grade work tasks has the responsibility to ensure compliance with all OSHA and industry standards related to trenching and excavation operations.
- All personnel onsite have the authority to suspend relevant site operations when it is evident that operations do not comply with established regulatory and industry safety standards.
- Calling applicable 811 service (Call Before You Dig).
  - Owners of overhead and underground installations will locate, identify and mark underground installations accordingly.
- Contractors are required to prepare their appropriate work permit documents (e.g. hot work permit, confined space permit, job safety & environmental analysis, etc.) prior to performing excavating and trenching operations.
  - Adhering to the controls/safety measures identified in their permit(s).



## 1.04(a) Contractors Responsibilities

### 5.9 Hot Work-Burning, Cutting, Hot Tapping and Welding

- Contractors performing hot work at a Coterra facility will demonstrate compliance with ISN subscription requirements. ISN program approval verifies the contractor's hot work program meets regulatory requirements.
- Contractors are required to prepare their appropriate work permit documents (e.g. hot work permit, confined space permit, job safety & environmental analysis, etc.) prior to performing any hot work covered tasks.
  - Adhering to the controls/safety measures identified in their permit(s).

### 5.10 Stop Work Authority

Stop Work Authority applies to everyone working at Coterra worksites. Contractors are responsible for:

- Developing and implementing a stop work authority program.
- Reporting any unsafe act or condition to their immediate supervisor.
  - Contractor supervision shall immediately report any unsafe act or condition to the coordinating Coterra representative (e.g. Coterra employee or Consultant)
- Training their employees or their subcontractors on their stop work authority program.
- Contractors operating on worksites are responsible for monitoring compliance with the requirements of this program and maintaining associated documents and training materials.

## 6.0 CONTRACTOR TRAINING

In accordance with the [OSH Act of 1970](#) Section (5)(a)(1) & (2), the contractor (employer) is solely responsible for providing training to their employees. Contractors are responsible for evidencing current training through their ISNetworld subscription.