

MOON-HINES-TIGRETT OPERATING CO., INC.

SPILL PREVENTION CONTROL
AND COUNTERMEASURE (SPCC) PLAN

EAST EUCUTTA FIELD
WAYNE COUNTY, MISSISSIPPI

JANUARY 2009

SPCC PLAN

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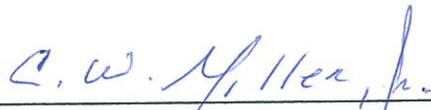
INTRODUCTION

THE ATTACHED SPILL PREVENTION CONTROL AND COUNTERMEASURE (SPCC) PLAN AS REQUIRED BY EPA REGULATIONS ON OIL POLLUTION PREVENTION (40 CFR-112) HAS BEEN PREPARED IN A FORMAT WHEREBY FACILITY OPERATORS MAY BEST UTILIZE THE INFORMATION AND/OR PROCEDURES FOUND THEREIN.

THE FORMAT HAS BEEN DEVELOPED ON THE BASIS OF PRACTICAL EXPERIENCE IN FIELD OPERATIONS AND IN CONFORMANCE WITH THE GUIDELINES OF 40 CFR-112.

MILCO, INC.
P. O. BOX 12335
JACKSON, MISSISSIPPI 39236

BY



C. W. MILLER, JR., P.E.

MANAGEMENT APPROVAL

THIS SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN WILL
BE IMPLEMENTED AS HEREIN DESCRIBED.

MOON-HINES-TIGRETT OPERATING CO. INC.

BY 

TERRY A. TIGRETT, JR.
PRESIDENT

CERTIFICATION

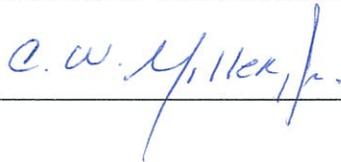
I HEREBY CERTIFY THAT I HAVE EXAMINED THE FACILITY AND BEING
FAMILIAR WITH THE PROVISIONS OF 40 CFR, PART 112, ATTEST THAT
THIS SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN HAS
BEEN PREPARED IN ACCORDANCE WITH GOOD ENGINEERING PRACTICES.

DATE: 2-4-2009

C. W. MILLER, JR.
REGISTERED PROFESSIONAL ENGINEER

(SEAL)





REGISTRATION NO. 5412

STATE OF MISSISSIPPI

SPCC PLAN

PART I

GENERAL INFORMATION

1. NAME OF FACILITY EAST EUCUTTA FIELD
2. TYPE OF FACILITY ONSHORE PRODUCTION: GATHERING &
TREATMENT FACILITY
3. LOCATION OF FACILITY SECTIONS 12 & 13, T9N-R9W
WAYNE COUNTY, MISSISSIPPI
REF: ATTACHMENT C
4. NAME AND ADDRESS OF OWNER OR OPERATOR
NAME MOON-HINES-TIGRETT OPERATING CO., INC.
ADDRESS P. O. BOX 3216
RIDGELAND, MISSISSIPPI 39158
TELEPHONE 601-572-8300
5. DESIGNATED PERSON ACCOUNTABLE FOR OIL SPILL PREVENTION AT FACILITY
NAME/TITLE WILLIAM CHANCELLOR - CONTRACT PUMPER
ADDRESS 1475 CO. ROAD 277
VOSSBURG, MS 39366
TELEPHONE ~~601-577-7187~~ 601-881-2975
~~601-736-2300~~ (CELL) ~~601-881-7551~~ (PAGER)
6. FACILITY EXPERIENCED A REPORTABLE OIL SPILL EVENT DURING THE
TWELVE MONTHS PRIOR TO JAN. 10, 1974 (EFFECTIVE DATE OF 40 CFR,
PART 112).
NONE
7. DATE FACILITY BEGAN OPERATION
MARCH 2004

SPCC PLAN

PART I

GENERAL INFORMATION

8. FACILITY DESCRIPTION (REF: ATTACHMENT A)

EAST EUCUTTA FIELD CONSISTS OF TWO (2) OIL PRODUCING WELLS AND ONE (1) SWDW UTILIZING ONE (1) INDIVIDUAL AND ONE (1) CENTRAL STORAGE TREATMENT FACILITY.

CTC MINERALS 13-3 #1 SWDW
API 23-153-205360000

SURFACE EQUIPMENT

ONE (1) WELLHEAD

CTB

ONE (1) HEATER TREATER
ONE (1) SURFACE PUMP UNIT
ONE (1) 500 BBL POWER OIL TANK (WELDED)
TWO (2) 400 BBL STORAGE TANKS (WELDED)
ONE (1) 300 BBL SW STORAGE TANK (FIBERGLASS)

CTC MINERALS 13-3 #2
API 23-153-20586001

SURFACE EQUIPMENT

ONE (1) WELLHEAD

CLARKE 12-15 #1
API 23-153-20745

SURFACE EQUIPMENT

ONE (1) WELLHEAD
ONE (1) PUMPING UNIT
ONE (1) HEATER TREATER
TWO (2) 400 BBL STORAGE TANKS (WELDED)
ONE (1) 400 BBL SW STORAGE TANK (WELDED)

SPCC PLAN

PART I

GENERAL INFORMATION - CONT"D

THE LOCATIONS BEING SUCH TO PERMIT THE BURIAL OF THE MAJORITY OF FLOWLINES AND ENCLOSURE OF ALL OIL & SALTWATER HANDLING, TREATING, AND STORAGE EQUIPMENT BY EARTHEN RETAINING WALLS (FW) OF SUFFICIENT SIZE TO CONTAIN AND/OR MINIMIZE POSSIBLE SPILL VOLUME OCCURRENCE.

SPCC PLAN

PART I

GENERAL INFORMATION

9. PAST SPILLS AND CAUSES. DESCRIBE EACH SPILL, CORRECTIVE ACTION TAKEN, AND ESTABLISHED PREVENTIVE MEASURES.

SPCC PLAN

PART II

POTENTIAL FUTURE SPILLS AND CAUSES

1. FROM THE FOLLOWING LIST OF POTENTIAL FUTURE SPILLS AND CAUSES

1. SECONDARY CONTAINMENT AVAILABLE

2. RATE OF FLOW

3. MAXIMUM SPILLAGE POSSIBLE

a. SPILLS FROM PIPE, VALVES, AND OTHER EQUIPMENT

(1) YES/NO (2) VARIABLE (3) < 1 BBL

b. WELLHEAD LEAKS

(1) NO (2) VARIABLE (3) < 1 BBL

c. FLOW LINE AND/OR GATHERING LINE LEAKS

(1) YES/NO (2) VARIABLE (3) < 1 BBL

d. TANK LEAKS AND/OR RUPTURES

(1) YES (2) VARIABLE (3) 40 BBL

e. TANK OVERFLOW

(1) YES (2) VARIABLE (3) 40 BBL

f. TRANSFER HOSE, COUPLING, AND LOADING RACK SPILLS

(1) YES/NO (2) VARIABLE (3) < 1 BBL

g. BURN PIT OVERFLOW

(1) - (2) - (3) -

h. BLOWOUT

(1) - (2) - (3) -

i. POSSIBLE SABOTAGE, ETC.

(1) YES/NO (2) VARIABLE (3) 40 BBL

CTC MINERALS 13-3 #1
SWDW

BASIS: 15 HRS
TRACE/DAY

SPCC PLAN

PART II

POTENTIAL FUTURE SPILLS AND CAUSES

1. FROM THE FOLLOWING LIST OF POTENTIAL FUTURE SPILLS AND CAUSES

1. SECONDARY CONTAINMENT AVAILABLE
2. RATE OF FLOW
3. MAXIMUM SPILLAGE POSSIBLE

- a. SPILLS FROM PIPE, VALVES, AND OTHER EQUIPMENT
(1) YES/NO (2) VARIABLE (3) 115 BBL
- b. WELLHEAD LEAKS
(1) YES/NO (2) VARIABLE (3) < 1 BBL
- c. FLOW LINE AND/OR GATHERING LINE LEAKS
(1) YES/NO (2) VARIABLE (3) < 1BBL
- d. TANK LEAKS AND/OR RUPTURES
(1) YES (2) VARIABLE (3) 360 BBL
- e. TANK OVERFLOW
(1) YES (2) 3 BBL/HR (3) 48 BBL
- f. TRANSFER HOSE, COUPLING, AND LOADING RACK SPILLS
(1) YES/NO (2) VARIABLE (3) < 1 BBL
- g. BURN PIT OVERFLOW
(1) - (2) - (3) -
- h. BLOWOUT
(1) - (2) - (3) -
- i. POSSIBLE SABOTAGE, ETC.
(1) YES/NO (2) VARIABLE (3) 830 BBL

CTC MINERALS 13-3 #2

BASIS: 15 HRS
76 BOPD
9/08

SPCC PLAN

PART II

POTENTIAL FUTURE SPILLS AND CAUSES

1. FROM THE FOLLOWING LIST OF POTENTIAL FUTURE SPILLS AND CAUSES

1. SECONDARY CONTAINMENT AVAILABLE

2. RATE OF FLOW

3. MAXIMUM SPILLAGE POSSIBLE

a. SPILLS FROM PIPE, VALVES, AND OTHER EQUIPMENT

(1) YES/NO (2) VARIABLE (3) 103 BBL

b. WELLHEAD LEAKS

(1) YES/NO (2) VARIABLE (3) < 1 BBL

c. FLOW LINE AND/OR GATHERING LINE LEAKS

(1) YES/NO (2) VARIABLE (3) < 1 BBL

d. TANK LEAKS AND/OR RUPTURES

(1) YES (2) VARIABLE (3) 360 BBL

e. TANK OVERFLOW

(1) YES (2) 2.5 BBL/HR (3) 38 BBL

f. TRANSFER HOSE, COUPLING, AND LOADING RACK SPILLS

(1) YES/NO (2) VARIABLE (3) < 1 BBL

g. BURN PIT OVERFLOW

(1) - (2) - (3) -

h. BLOWOUT

(1) - (2) - (3) -

i. POSSIBLE SABOTAGE, ETC.

(1) YES/NO (2) VARIABLE (3) 360 BBL

CLARKE 12-15 #1

BASIS: 15 HRS
60 BOPD
8/08

SPCC PLAN

PART II

POTENTIAL FUTURE SPILLS AND CAUSES

THE LOCATIONS ARE CHECKED A MINIMUM OF ONCE A DAY BY A CONTRACT PUMPER. OIL TRANSFER BEING BY TRANSPORT WHICH IS CHECKED FOR TANK INTEGRITY PRIOR TO TRANSFER OPERATIONS. SALTWATER DISPOSAL BEING BY CLOSED SYSTEM. PUMPER IS NORMALLY PRESENT DURING TRANSFER OPERATIONS OR FACILITY IS CHECKED SHORTLY THEREAFTER FOR ANY ENVIRONMENTAL IMPACT.

2. DIRECTION OF FLOW

SOUTHERLY

3. NAME OF RECEIVING WATER (REF: ATTACHMENT B)

WAGON BRANCH CREEK

SPCC PLAN

PART III

PREVENTION MEASURES ESTABLISHED OR PLANNED

1. FACILITY DRAINAGE

a. DESCRIBE DRAINAGE PROCEDURES FROM DIKED STORAGE AREAS:

DIKE AREA WILL BE DRAINED BY FIREWALL DRAIN AND/OR VACUUM TRUCK AFTER INSPECTION FOR ANY POLLUTANTS BY AUTHORIZED PERSONNEL. SHOULD HYDROCARBONS AND/OR SALTWATER BE PRESENT, THEY WILL BE TREATED AND RETURNED TO STORAGE. SOURCES OF HYDROCARBON AND/OR SALTWATER WILL BE DETERMINED AND CORRECTIVE ACTION WILL BE INITIATED IMMEDIATELY.

b. FIELD DRAINAGE DITCHES, ROAD DITCHES, AND OIL TRAPS, SUMPS, OR SKIMMERS, IF SUCH EXIST, ARE INSPECTED AT REGULARLY SCHEDULED INTERVALS FOR ACCUMULATION OF OIL. DESCRIPTION OF INSPECTION PROCEDURES, INTERVALS, AND METHODS TO BE USED TO REMOVE OIL:

DAILY VISUAL INSPECTION OF THE ABOVE IS TO BE MADE. IF ANY ACCUMULATIONS OF OIL OR OTHER POLLUTANTS ARE FOUND, CONTAINMENT WILL BE MADE AND REMOVAL WILL BE BY VACUUM TRUCK AND ABSORBENTS.

2. BULK STORAGE TANKS

a. DESCRIPTION OF TANK DESIGN AND CONSTRUCTION MATERIALS:

TANKS ARE OF STEEL WELDED CONSTRUCTION AND ARE ADEQUATE TO MEET ALL API STANDARDS.

b. DESCRIPTION OF SECONDARY CONTAINMENT DESIGN, CONSTRUCTION MATERIALS AND VOLUME:

SECONDARY CONTAINMENT IS EARTHEN DIKES SUFFICIENTLY IMPERVIOUS TO HYDROCARBONS AND OTHER POLLUTANTS. THEY ARE OF SUFFICIENT CAPACITY TO CONTAIN $1\frac{1}{2}$ TIMES THE LARGEST TANK VOLUME.

c. DESCRIPTION OF TANK EXAMINATION METHODS AND PROCEDURES:

DAILY VISUAL INSPECTION BY AUTHORIZED PERSONNEL (PUMPER) FOR POSSIBLE LEAKS AND OTHER DEFECTS. MONTHLY/QUARTERLY INSPECTION BY PRODUCTION SUPERVISORY PERSONNEL.

SPCC PLAN

PART III

PREVENTION MEASURES ESTABLISHED OR PLANNED

- d. DESCRIPTION OF MEASURES WHICH ARE UTILIZED TO MAKE TANK BATTERIES FAILSAFE:

THE TANKAGE IS OF SUFFICIENT CAPACITY TO CONTAIN SEVERAL DAYS OF FLUID PRODUCTION. FLUID LEVELS ARE CHECKED DAILY. TANKS ARE EQUIPPED WITH EQUALIZER LINES AND ADEQUATE VENTING TO PREVENT OVERFLOW AND COLLAPSE.

3. FACILITY TRANSFER OPERATIONS

- a. DESCRIBE PERIODIC EXAMINATION OF ABOVE-GROUND VALVES AND PIPELINES:

DAILY INSPECTIONS ARE MADE BY AUTHORIZED PERSONNEL. ANY LEAKS OR SEEPAGE ARE CORRECTED IMMEDIATELY. CONTAINMENT AND CLEAN-UP MEASURES ARE PERFORMED IMMEDIATELY.

- b. DESCRIBE PERIODIC EXAMINATION OF SALTWATER DISPOSAL FACILITIES:

SAME AS 2C

- c. DESCRIBE FLOWLINE MAINTENANCE PROGRAM TO PREVENT SPILLS:

FLOWLINE MAINTENANCE PROGRAM CONSISTS OF DAILY INSPECTIONS FOR LEAKS OR SOURCES OF POSSIBLE FAILURES. FLOWLINES ARE PRESSURE TESTED PERIODICALLY AND REPLACED OR REPAIRED AS REQUIRED. RECORDS ARE MAINTAINED OF ALL FLOWLINE FAILURES AND REPAIRS.

4. INSPECTIONS AND RECORDS

- a. THE REQUIRED INSPECTIONS FOLLOW WRITTEN PROCEDURES YES
- b. THE WRITTEN PROCEDURES AND A RECORD OF INSPECTIONS, SIGNED BY THE APPROPRIATE SUPERVISOR AND/OR INSPECTOR ARE ATTACHED (ATTACHMENT D): YES

SPCC PLAN

PART III

PREVENTION MEASURES ESTABLISHED OR PLANNED

5. PERSONNEL, TRAINING, AND SPILL PREVENTION PROCEDURES

a. PERSONNEL ARE PROPERLY INSTRUCTED IN THE FOLLOWING:

- (1) OPERATION AND MAINTENANCE OF EQUIPMENT
TO PREVENT OIL DISCHARGES YES
- (2) APPLICABLE POLLUTION CONTROL LAWS, RULES,
AND REGULATIONS YES

INSTRUCTION PROCEDURES: PERTINENT INFORMATION IS DISTRIBUTED TO ALL PRODUCTION PERSONNEL. REGULAR PERIODIC SAFETY MEETINGS AND SPECIAL MEETINGS FOR SPECIFIC ITEMS ARE DEVOTED TO INSTRUCTIONS ON NEW REGULATIONS AND REVIEW OF EXISTING REGULATIONS. SPECIAL PROBLEMS AND THE SOLUTION OF THOSE PROBLEMS ARE DISCUSSED. PERSONNEL ARE CONTINUALLY INSTRUCTED TO CARRY OUT THE NECESSARY MAINTENANCE AND OPERATION OF THE FACILITY(S) TO PREVENT OIL AND/OR POLLUTANT SPILLAGE.

b. SCHEDULED PREVENTION BRIEFINGS FOR OPERATING PERSONNEL ARE CONDUCTED AT FREQUENT INTERVALS TO INSURE ADEQUATE UNDERSTANDING OF THE SPCC PLAN YES

BRIEFING PROGRAM: THE CONTINUED IMPLEMENTATION OF THE PROVISIONS SET FORTH IN THE SPCC PLAN, AS WELL AS THE IMPORTANCE IN FOLLOWING THE STEPS OUTLINED IN THE CONTINGENCY PLAN SHOULD A SPILL OCCUR, ARE EMPHASIZED TO ALL PRODUCTION OPERATING PERSONNEL. DATES OF BRIEFING ARE RECORDED.

6. OIL DRILLING AND WORKOVER FACILITIES

a. A BLOWOUT PREVENTER (BOP) ASSEMBLY AND/OR WELL CONTROL SYSTEM IS TO BE INSTALLED PRIOR TO DRILLING (DEEPENING) BELOW ANY CASING STRING AND AS REQUIRED DURING WORK-OVER OPERATIONS.

b. THE BOP ASSEMBLY IS CAPABLE OF CONTROLLING ANY ANTICIPATED WELLHEAD PRESSURE.

SPCC PLAN

PART IV

OIL SPILL CONTINGENCY PLAN

ACTION AND NOTIFICATION BY COMPANY PERSONNEL IN THE EVENT OF A SPILL.

- A. STOP SPILL AT THE SOURCE.
- B. BEGIN CONTAINMENT PROCEDURES.
- C. NOTIFY THE PRODUCTION FOREMAN AND/OR THE PRODUCTION MANAGER AND INFORM HIM OF THE LOCATION, SIZE (QUANTITY) AND EXTENT (SEVERITY) OF THE SPILL.
- D. THE PRODUCTION MANAGER WILL SEND COMPANY AND/OR CONTRACT PERSONNEL IF REQUIRED TO ASSURE CONTAINMENT OF THE SPILL AND WITH MAIN OFFICE APPROVAL WILL INITIATE CLEAN UP AND DISPOSAL OPERATIONS AS PER REGULATORY GUIDE LINES. THE DISTRICT AND/OR MAIN OFFICE WILL BE PROMPTLY NOTIFIED AND GIVEN THE PERTINENT INFORMATION REGARDING THE SPILL (PARA. 5).

DEPENDING UPON THE EXTENT OF THE INCIDENT, THE PRODUCTION MANAGER AND/OR THE MAIN OFFICE WILL TAKE THE NECESSARY STEPS TO INSURE THAT REGULATORY NOTIFICATION IS INITIATED, REGULATORY APPROVAL IS GIVEN FOR CLEAN UP, AND REQUIRED REPORTS ARE SUBMITTED TO REGULATORY AGENCIES (MUNICIPAL, COUNTY, STATE, AND FEDERAL).

- E. THE FOLLOWING EVENTS SHOULD BE REPORTED:
 1. ACCIDENTS RESULTING IN LIFE-THREATING INJURIES OR LOSS OF LIFE.
 2. BLOWOUT, EXPLOSION AND/OR FIRE.
 3. OIL SPILL AND/OR POLLUTION CONTAMINATION.
 4. THEFT.
 5. NOTICE OF INTENT TO TRANSFER OIL.
- F. SPILL INFORMATION.
 1. NAME, ADDRESS, TELEPHONE NUMBER OF PERSON REPORTING.
 2. EXACT LOCATION OF SPILL AND DIRECTIONS.
 3. COMPANY AND/OR OPERATOR NAME AND LOCATION.

SPCC PLAN

PART IV

CONT'D

OIL SPILL CONTINGENCY PLAN

4. MATERIAL SPILLED.
5. ESTIMATED QUANTITY.
6. SOURCE OF SPILL.
7. CAUSE OF SPILL.
8. NAME OF WATERWAY (INVOLVED) AND/OR NEAREST WATERWAY TO THE SPILL AREA WHICH MAY BE CAUSE FOR RESPONSE.
9. ACTION TAKEN FOR CONTAINMENT AND CLEAN UP.
10. DESCRIPTION OF ANY BODILY INJURY OR LOSS OF LIFE.

SPCC PLAN

PART IV

CONT'D

OIL SPILL CONTINGENCY PLAN

G. FEDERAL AND STATE AGENCIES:

OSHA (E1)
1-800-321-OSHA

EPA, REGION IV (E2 & E3)
1-404-562-9900
1-404-562-8752/8707

MISSISSIPPI DEQ (E2 & E3)
1-601-961-5171

MISSISSIPPI OIL & GAS BOARD (E2, E3, E4, E5)
1-601-354-7142

SPCC PLAN

PART IV

OIL SPILL CONTINGENCY PLAN

2. LIST OF CONTRACT PERSONNEL AND EMERGENCY NUMBERS

T. K. STANLEY, INC.
WAYNESBORO, MS
601-735-2855 (OFFICE)

CLARKCO CONTRACTORS
HEIDELBERG, MS
601-787-3447

KELLY BROS., INC.
WAYNESBORO, MS
601-735-2541
FLOMATON, AL
251-296-4625

BOOTS SMITH, INC.
LAUREL, MS
601-649-1220

HOLMES OIL FIELD CONTRACTOR
BROOKHAVEN, MS
601-833-8272 (OFFICE)
601-757-7529 (JERRY HOLMES CELL)

MISSISSIPPI SPILL REPORTING

REPORTABLE SPILLS

TELEPHONE NUMBERS

NATIONAL RESPONSE CENTER
(ALL SPILLS ENTERING WATERWAYS)

(800) 424-8802

U. S. ENVIRONMENTAL PROTECTION AGENCY (EPA)
(ALL SPILLS ENTERING WATERWAYS)

ATLANTA (404) 562-9900

MISSISSIPPI OIL AND GAS BOARD
(ALL SPILLS)

JACKSON (601) 354-7142

MISSISSIPPI DEQ OFFICE
(ALL SPILLS)

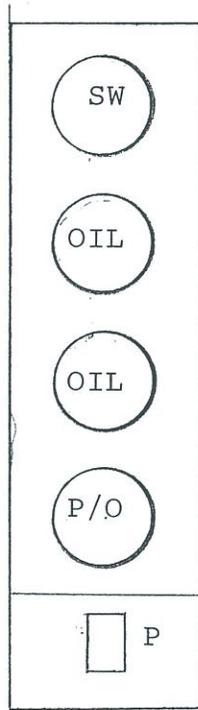
JACKSON (601) 961-5171

ATTACHMENT A
EUCUTTA FIELD



⊕ 13-3 #2

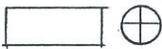
⊕ 13-3 #1



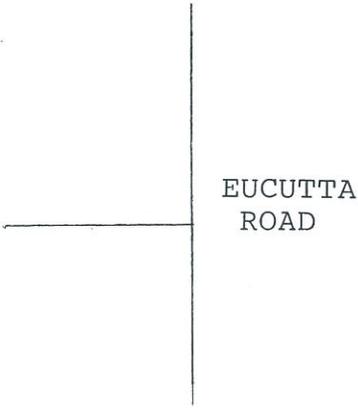
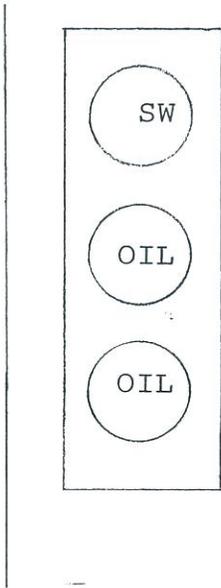
EUCUTTA
ROAD

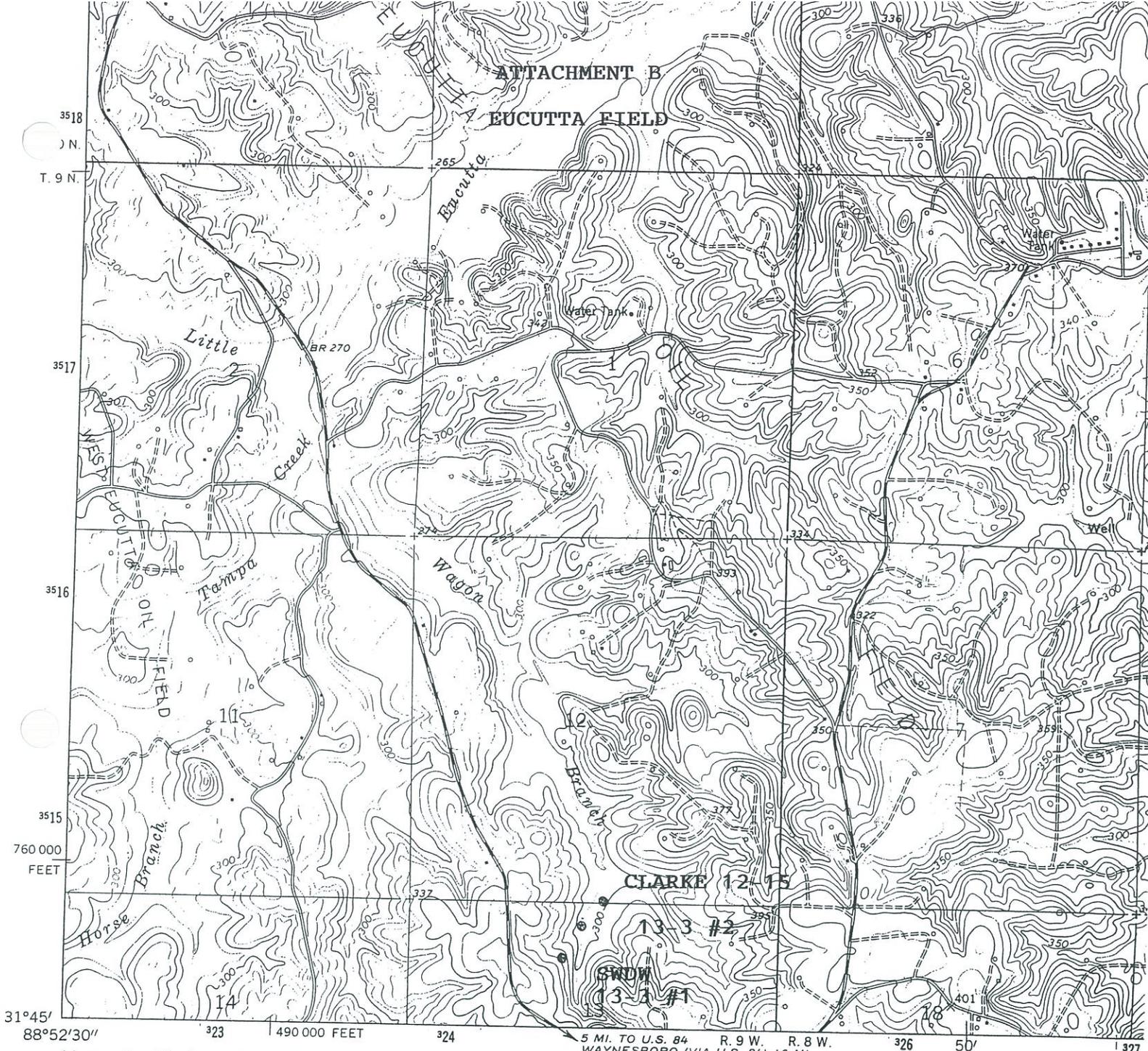
ATTACHMENT A

EUCUTTA FIELD

 CLARKE 12-15 #1

 HT





Mapped, edited, and published by the Geological Survey

Control by USGS and USC&GS

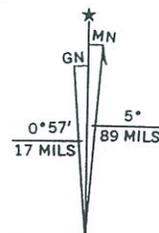
Topography by photogrammetric methods from aerial photographs taken 1960. Field checked 1964

Polyconic projection. 1927 North American datum
10,000-foot grid based on Mississippi coordinate system, east zone
1000-metre Universal Transverse Mercator grid ticks, zone 16, shown in blue

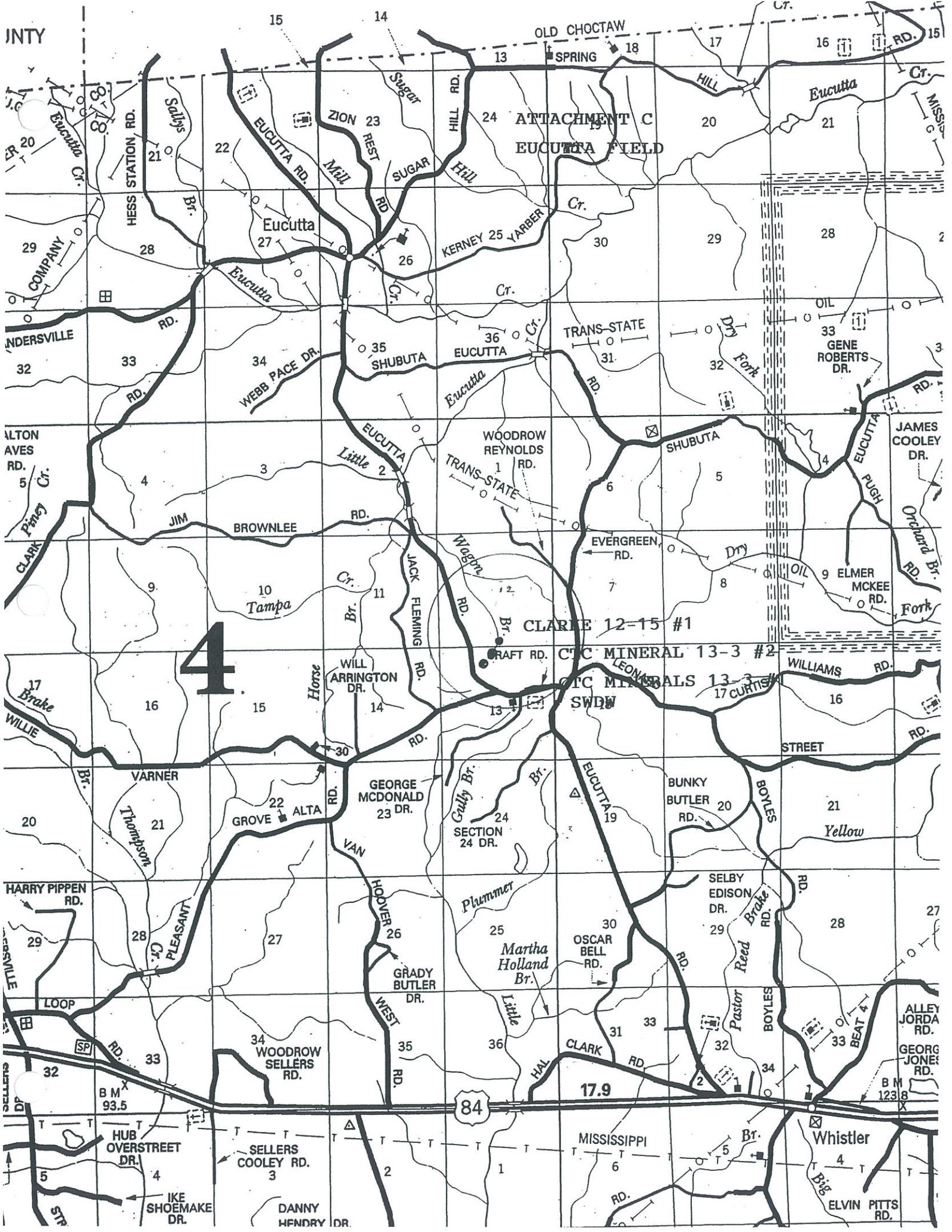
Fine red dashed lines indicate selected fence and field lines where generally visible on aerial photographs. This information is unchecked

Map photoinspected 1973

No major culture or drainage changes observed



UTM GRID AND 1964 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET



INTY

OLD CHOCTAW

SPRING

ATTACHMENT C
EUCUTTA FIELD

4

CLARIE 12-15 #1

CTC MINERAL 13-3 #2

CTC MINERALS 13-3

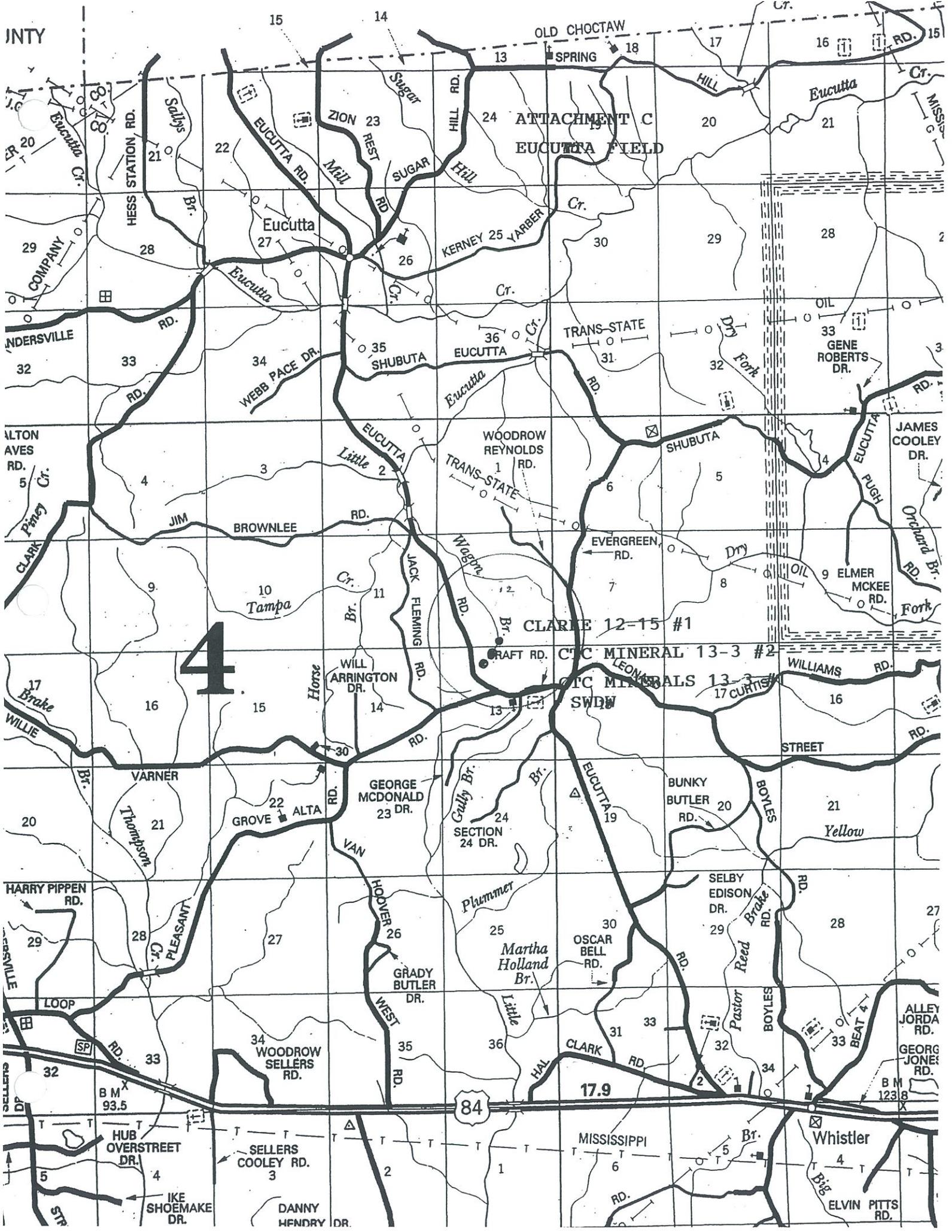
SWDW

84

17.9

Whistler

Big ELVIN PITTS RD.



SPCC PLAN

ATTACHMENT D

PROCEDURES FOR INSPECTIONS AND RECORDS

TO ALL PUMPERS, GAUGERS, PRODUCTION FOREMEN AND/OR SUPERINTENDENTS

1. BEFORE DRAINAGE OF RAINWATER FROM ANY DIKED AREA, YOU ARE TO INSPECT AND EXAMINE SUCH FLUID TO INSURE THAT NO POLLUTANTS (SALTWATER AND/OR OIL) WILL BE DISCHARGED FROM THE FACILITY. SHOULD POLLUTANTS BE PRESENT, THEY ARE TO BE PICKED UP BY SUCTION PUMPS AND/OR VACUUM TRUCKS AND DISPOSED OF PROPERLY. DRAINAGE CONTROL VALVES, IF USED WILL BE MANUALLY OPENED AND RESEALED FOLLOWING DRAINAGE OPERATIONS. ADEQUATE RECORDS OF SUCH OPERATIONS WILL BE MAINTAINED BY YOU AND SUBMITTED TO MY OFFICE ON A PERIODIC BASIS.
2. DAILY VISUAL INSPECTION OF ALL TANK BATTERIES, WELLHEADS, TREATERS, AND ASSOCIATED SURFACE EQUIPMENT: FLOWLINES, WATERLINES, GAS LINES, DRAIN LINES, VALVES, AND FIREWALLS WILL BE A DAILY JOB RESPONSIBILITY. ANY NEED FOR MAINTENANCE, REPAIR, AND REPLACEMENT SHOULD BE DIRECTED TO MY ATTENTION IMMEDIATELY.
3. YOU WILL VISUALLY EXAMINE ON A DAILY BASIS ALL ABOVE GROUND VALVES, PIPELINES, AND GENERAL CONDITION OF ITEMS SUCH AS FLANGE JOINTS, VALVE GLANDS AND BODIES, PIPELINE SUPPORTS, BLEEDER AND GAUGE VALVES, AND GAUGE SIGHT GLASSES, ETC. A DAILY VISUAL INSPECTION IS TO BE MADE OF THE POLISHED ROD STUFFING BOX, THE WELLHEAD (X-MAS TREE) AND VALVES, THE BURN PIT CONDITION, SALTWATER DISPOSAL SYSTEM CONDITION, AND ANY AND ALL OTHER ASSOCIATED EQUIPMENT. IMMEDIATELY REPORT ANY OIL AND/OR SALTWATER LEAKAGE OR IMPENDING TROUBLE IN ANY OF THE ABOVE TO MY OFFICE.
4. ROAD DITCHES, FIELD DRAINAGE DITCHES, AND COLLECTOR TRAPS ARE TO BE CHECKED ON A DAILY BASIS DURING ROUTINE OPERATIONS. LARGE ACCUMULATIONS OF OIL MAY BE PICKED UP BY A VACUUM TRUCK. SAND FILL ACCUMULATION IN COLLECTOR TRAPS IS TO BE CLEANED OUT AS REQUIRED.
5. GOOD HOUSEKEEPING PRACTICES AT ALL FACILITIES ARE AN ESSENTIAL AND A REQUIRED JOB FUNCTION. ALL LEAKS (REGARDLESS OF SIZE) WILL BE CLEANED UP IMMEDIATELY AND PROPER CORRECTIVE ACTION WILL BE TAKEN. THE CONDITION OF THE GROUND WITHIN DIKED AREAS AND AROUND LOADING AREAS OF TANK BATTERIES SHOULD BE NOTED, AS STAINS WILL CAUSE DISCHARGE OF SHEENS. CONTAMINATED SOIL

SPCC PLAN
ATTACHMENT D

PROCEDURES FOR INSPECTIONS AND RECORDS

TO ALL PUMPERS, GAUGERS, PRODUCTION FOREMEN AND/OR SUPERINTENDENTS

SHOULD BE REMOVED AND TAKEN TO A NEARBY APPROVED LANDFILL.
NOTIFY MY OFFICE IMMEDIATELY SHOULD THERE BE ANY COMPLAINTS
FROM FIELD INSPECTORS OF ANY STATE AND/OR FEDERAL AGENCY OR
FROM ANY LANDOWNER.

DOCUMENT ANY CONVERSATIONS YOU MAY HAVE WITH ANY AGENCY
REPRESENTATIVE AND/OR LANDOWNER.

6. YOU ARE TO MAINTAIN RECORDS OF ALL INSPECTIONS MADE IN THE
ABOVE PARA. 1, 2, 3, AND 4. SUCH RECORDS ARE TO BE SUBMITTED
TO MY OFFICE ON A PERIODIC BASIS OR UPON REQUEST.



TERRY A. TIGRETT, JR.
PRESIDENT
MOON-HINES-TIGRETT OPERATING CO., INC.

SPCC PLAN

ATTACHMENT D, CONTINUED

RECORD OF INSPECTION, DRAINAGE, AND OIL REMOVAL OF SECONDARY CONTAINMENT

CTC MINERALS 13-3 #1 SWDW

<u>DATE OF INSPECTION</u>	<u>DATE OF RAINWATER REMOVAL</u>	<u>DATE OF SALTWATER REMOVAL</u>	<u>DATE OF OIL REMOVAL</u>	<u>INSPECTOR'S SIGNATURE</u>
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SPCC PLAN

ATTACHMENT D, CONTINUED

RECORD OF INSPECTION, DRAINAGE, AND OIL REMOVAL OF SECONDARY CONTAINMENT

CTC MINERALS 13-3 #2

<u>DATE OF INSPECTION</u>	<u>DATE OF RAINWATER REMOVAL</u>	<u>DATE OF SALTWATER REMOVAL</u>	<u>DATE OF OIL REMOVAL</u>	<u>INSPECTOR'S SIGNATURE</u>
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SPCC PLAN

ATTACHMENT D, CONTINUED

RECORD OF INSPECTION, DRAINAGE, AND OIL REMOVAL OF SECONDARY CONTAINMENT

CLARKE 12-15 #1

<u>DATE OF</u> <u>INSPECTION</u>	<u>DATE OF</u> <u>RAINWATER</u> <u>REMOVAL</u>	<u>DATE OF</u> <u>SALTWATER</u> <u>REMOVAL</u>	<u>DATE OF</u> <u>OIL</u> <u>REMOVAL</u>	<u>INSPECTOR'S</u> <u>SIGNATURE</u>
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CERTIFICATION OF SUBSTANTIAL HARM DETERMINATION FORM

FACILITY NAME EUCUTTA FIELD

FACILITY ADDRESS SECTIONS 12 & 13, T9N - R9W

WAYNE COUNTY, MISSISSIPPI

Does the facility have a maximum aboveground storage capacity greater than or equal to 42,000 gallons and do the operations include over water transfers of oil to or from vessels?

YES _____ NO X _____

Does the facility have a maximum aboveground storage capacity greater than or equal to one million (1,000,000) gallons and is the facility without secondary containment for each aboveground storage area sufficiently large to contain the capacity of the largest aboveground storage tank within the storage area?

YES _____ NO X _____

Does the facility have a maximum aboveground storage capacity greater than or equal to one million (1,000,000) gallons and is the facility located at a distance (as calculated in Attachment C-III) such that a discharge from the facility could adversely impact an environmentally sensitive area as defined in Appendix D?

YES _____ NO X _____

Does the facility have a maximum aboveground storage capacity greater than or equal to one million (1,000,000) gallons and is the facility located at a distance (as calculated in Attachment C-III) such that a discharge from the facility could shut down a public drinking water intake?

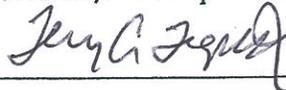
YES _____ NO X _____

Does the facility have a maximum aboveground storage capacity greater than or equal to one million (1,000,000) gallons and within the past 5 years has the facility experienced a reportable spill in an amount greater than or equal to 10,000 gallons?

YES _____ NO X _____

CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and that based on my inquiry of these individuals responsible for obtaining information, I believe that the submitted information is true, accurate, and complete.



Signature: _____

TERRY A. TIGRETT, JR.

Name (please type or print) _____

PRESIDENT MOON-HINES-TIGRETT OPERATING CO., INC.

Title _____

Date _____

2-26-09