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In Reply Refer To:

FWS/R2/ES/FOIA DOI-FWS-2021-000389

# United States Department of the Interior

FISH AND WILDLIFE SERVICE



Post Office Box 1306 Albuquerque, New Mexico 87103

November 2, 2020

This responds to your Freedom of Information Act (FOIA) request dated October 24, 2020, in which you seek the following:

"A copy of the 2019 Inland Oil Spill Training Exercise - Tabletop Spill Drill (Texas), and a copy of the After-Action Report or Wrap-up or Final Assessment/Report or other conclusory document."

Your FOIA request was assigned tracking number DOI-FWS-2021-000389 and forwarded to Hagerman National Wildlife Refuge for processing. In response to your request, staff located two records and they are provided to you in full with this letter.

Please note the 2007 FOIA amendments created the Office of Government Information Services (OGIS) to offer mediation services to resolve disputes between FOIA requesters and Federal agencies as a non-exclusive alternative to litigation. Using OGIS services does not affect your right to pursue litigation and does not affect the timing of filing an appeal with the Department's FOIA & Privacy Act Appeals Officer. You may contact OGIS in any of the following ways:

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For your information, Congress excluded three discrete categories of law enforcement and national security records from the requirements of the FOIA. See 5 U.S.C. § 552(c) (2006 & Supp. IV (2010)). This response is limited to those records that are subject to the requirements of the FOIA. This is a standard notification that is given to all our requesters and should not be taken as an indication that excluded records do, or do not, exist.

This completes the Service's response. The fees incurred in responding to your request are less than \$50.00, and are not being charged in accordance with 43 C.F.R. § 2.37(g). If you have any questions or concerns regarding this request, please contact Government Information Specialist, David Tischer, by email at david\_tischer@fws.gov.

Sincerely,





# Inland Oil Spill Tabletop Exercise

Situation Manual January 29, 2019

	Tabletop Exercise Overview
Exercise Name	Inland Oil Spill Tabletop Exercise
Exercise Date	January 29, 2019
Scope	This is a Tabletop Exercise, planned for 6 hours at the Hagerman National Wildlife Refuge Headquarters and Visitor Center, Sherman TX. Exercise play is limited to the general operational & response actions of NWR personnel, invited participants/agencies.
Drill Core Components	<ul> <li>Notifications</li> <li>Staff / Contractor Mobilization</li> <li>Response Management System</li> <li>Source Control</li> <li>Assessment</li> <li>Containment</li> <li>Mitigation</li> <li>Protection</li> <li>Communications</li> <li>Documentation</li> </ul>
Threat or Hazard	Hazardous Materials Response – Crude Oil
Scenario	A Tornado passes through Hagerman National Wildlife Refuge causing damage to several wells, storage and containment. The damage results in oil flowing uncontrolled into the waters of Lake Texoma.
Sponsor	Mary Maddux Regional Oil & Gas Specialist; Region 2 Hagerman National Wildlife Refuge 6465 Refuge Road Sherman, TX 75020
Participating Organizations	Hagerman National Wildlife Refuge, US Fish and Wildlife Service staff (USFWS), Environmental Protection Agency (EPA), US Army Corps of Engineers-Texoma Lake Office (USACE), Texas Parks and Wildlife Department (TPWD), Texas Railroad Commission (RRC), Texas Commission on Environmental Quality (TECQ) and Grayson County Office of Emergency Management (GCOEM) A complete roster of participants is provided in Appendix C.
Exercise Coordinator	Mr. Doug Schuster, CET, MEP, CSM Cell: (904) 868-1490 Email: doug.schuster@emsics.com

## **GENERAL INFORMATION**

The objectives and aligned core components are guided by the ERP & Operations Manual requirements, and selected by the Exercise Planning Team for this exercise. The Emergency Response Plan & the Facility Operations manual will be available for all exercise participants.

### **Regulations, Policy Letters,**

TBD

### **Exercise Objectives and Core Components**

The following OPA90/PREP exercise objectives describe the expected outcomes for the exercise. The objectives are linked to PREP core components, which are distinct critical elements necessary to achieve an effective response. The objectives and aligned core components are guided by the 2016 EPA and OPA90/PREP requirements and selected by the Exercise Planning Team for this exercise.

The Incident Management Team will demonstrate:

- 1. Knowledge of the SPCC plan.
- 2. Knowledge of proper notifications.
- 3. Communication system processes.
- 4. Ability to access an OSRO.
- 5. Coordination of internal organization personnel with responsibility for spill response.
- 6. Review the transition from a local team to a regional team.
- 7. Knowledge of response coordination with the National Response System (NRS) to include the EPA and/or Coast Guard, state and local response agencies.
- 8. Ability to access information from the SPCC Plan for location of sensitive areas, response strategies and for the recovery and disposal of spilled product.

## **Participant Roles and Responsibilities**

The term *participant* encompasses many groups of people, not just those playing in the exercise. Groups of participants involved in the exercise, and their respective roles and responsibilities, are as follows:

- **Players.** Players are personnel who have an active role in discussing or performing their regular roles and responsibilities during the exercise. Players discuss or initiate actions in response to the simulated emergency.
- **Observers.** Observers do not directly participate in the exercise. However, they may support the development of player responses to the situation during the discussion by asking relevant questions or providing subject matter expertise.
- **Facilitators.** Facilitators provide situation updates and moderate discussions. They also provide additional information or resolve questions as required. Key Exercise Planning Team members also may assist with facilitation as subject matter experts (SMEs) during the exercise.
- **Evaluators.** Evaluators are assigned to observe and document certain objectives during the exercise. Their primary role is to document player discussions, including how and if those discussions conform to plans, polices, and procedures.

## **Exercise Structure**

This exercise will be a facilitated discussion-based exercise by Norfolk Southern personnel. Each phase will begin with a written update that summarizes key events occurring within that time period. After the updates, participants will review the situation and engage in a group discussion on appropriate response and recovery issues.

Players will participate in the following three phases:

Phase 1: Initial Notifications and Activations

- Initial Responders
- Response Management
- Oil Spill Removal Organizations

### Phase 2: Initial Response

- Initial Responders
- Response Management
- Oil Spill Removal Organizations

Phase 3: Response Management System

- Unified Command
- Command Staff Safety, Public Information (Affairs) and Liaison
- General Staff Operations, Planning, Finance, Logistics
   \*During Phase 3, participants will engage in a facilitated discussion based on the scenario and the Response Management System which includes: Single

Command/Unified Command, Response Objectives, Priorities, Limitations & Constraints, Safety, Stakeholder Engagement, Booming and Protection Strategies.

### **Exercise Guidelines**

- This exercise will be held in an open, low-stress, no-fault environment. Varying viewpoints, even disagreements, are expected.
- Respond to the scenario using your knowledge of current plans and capabilities (i.e., you may use only existing assets) and insights derived from your training.
- Decisions are not precedent setting, and may not reflect your organization's final position on a given issue. This exercise is an opportunity to discuss and present multiple options and possible solutions.
- Issue identification is not as valuable as suggestions and recommended actions that could improve plans & procedures. Problem-solving efforts should be the focus.

## **Exercise Assumptions and Artificialities**

In any exercise, assumptions and artificialities may be necessary to complete play in the time allotted and/or account for logistical limitations. Exercise participants should accept that assumptions and artificialities are inherent in any exercise, and should not allow these considerations to negatively impact their participation. During this exercise, the following apply:

- Normal drainage routes will allow a worst-case discharge scenario from the large oil storage tanks and wells to travel off site and into the Lake Texoma.
- The exercise is conducted in a no-fault learning environment wherein capabilities, plans, systems, and processes will be evaluated.
- The exercise scenario is plausible, and events occur as they are presented.
- All players receive information at the same time.

### **Exercise Evaluation**

Evaluation of the exercise is based on the exercise objectives, aligned core components, and critical tasks detailed in the Operators contingency plans. Additionally, players will be asked to participate in a hot wash and complete participant feedback forms. These documents, coupled with facilitator observations and notes, will be used to evaluate the exercise and compile an After-Action Report (AAR) and Improvement Plan.

# **MODULE 1: INITIAL NOTIFICATIONS AND ACTIVATIONS**

#### Day One

The first part of March in North Texas has seen an unusual amount of rainfall and the entire area below the ground is saturated. Any additional rainfall will remain on the surface and create large amounts of runoff to on-site drainage ditches and waterways.

0830 – Doppler radar at the National Weather Service has indicated a severe thunderstorm that is producing heavy rain and dangerous lightening, resulting in flash flooding, dangerously large hail, and high winds. A Severe Thunderstorm Warning has been issued for Grayson County and the adjacent areas.

0847 – The National Weather Service issues a Tornado Warning for Grayson County. A tornado warning means a tornado has been sighted or indicated by weather radar. There is imminent danger to life and property.

0855 – Multiple reports to 911 indicate there is a tornado on the ground in the vicinity of Sadler TX, moving toward the Hagerman National Wildlife Refuge.

0959 – A tornado passes through Hagerman National Wildlife Refuge causing major damage to several wells, storage and containment. Personnel that were sheltered in place during the tornado warning are reporting a strong smell oil. All personnel are accounted for and no injuries have been reported.

1003 – The NWR Oil and Gas specialist reports a catastrophic spill and there is a breach in the primary and secondary containment with oil flowing uncontrolled into the Texoma Lake.

The temperature is 68°F with 69% humidity, cloudy skies and winds are sustained at 15 mph with an occasional gust to 25 mph. Temperatures are expected to rise to the mid to upper 70s for the reminder of the day.



## Questions

Based on the information provided, participate in a discussion concerning the issues raised in Phase 1. Identify any critical issues, decisions, requirements, or questions that should be addressed at this time.

The following questions are provided as suggested subjects that you may wish to address as the discussion progresses. These questions are not meant to constitute a definitive list of concerns to be addressed, nor is there a requirement to address every question.

### **Initial Responders**

- What is the incident notification response process for the Hagerman National Wildlife Refuge?
- What are the Initial Response Actions for all agencies, once the report has been recvd?

### **Response Management**

- What are the roles of the NWR, Operators? Would any other agencies participate in the response effort?
- For NWR staff that are not assigned to Hagerman, but may be called in to support a response, how does the notification and mobilization process work?

### Oil Spill Removal Organizations

- When the initial call is made to your company, what kinds of information are you looking for?
- What factors would you consider when making decisions to deploy or activate resource

# MODULE 2: INITIAL RESPONSE

### Day One

1005–

- The tornado path caused the earthen dike to fail. Oil is flowing into the Lake Texoma waters.
- Due to multiple reports of debris on roadways, the Texas State Highway Patrol have closed some roads accessing the park.
- It is estimated that at least 500 barrels of product have been released at this time.
- Oiled wildlife has been observed.



## Questions

Based on the information provided, participate in a discussion concerning the issues raised in Phase 2. Identify any critical issues, decisions, requirements, or questions that should be addressed at this time.

The following questions are provided as suggested subjects that you may wish to address as the discussion progresses. These questions are not meant to constitute a definitive list of concerns to be addressed, nor is there a requirement to address every question.

### **Initial Responders**

- What are the initial response actions for local Operators response team members on scene?
- What is the Product Specific Response Considerations for the release of crude oil?
- What initial priorities and objectives will need to be established?

### **Response Management**

- What information are you using to evaluate the severity, impacts and response requirements?
- What other resources will you consider for activation?

## **Oil Spill Removal Organizations**

- What are your company's procedures and priorities for this incident?
- What resources are you considering for potential mobilization?
- What are your estimated response times for each off-site location to deploy equipment?

# MODULE 3: RESPONSE MANAGEMENT SYSTEM

### Day One

- Members of the Incident Management Team (IMT) are preparing for an ICS 201 Transfer of Command Briefing.
- A fire has been identified at one of the leaking wells and is expanding to nearby trees and vegetation.
- The local response team and Oil Spill Removal Organization have begun deploying containment boom, sorbent pads and vacuum trucks along the Texoma Lake



## Questions

Based on the information provided, participate in a discussion concerning the issues raised in Phase 3. Identify any critical issues, decisions, requirements, or questions that should be addressed at this time.

The following questions are provided as suggested subjects that you may wish to address as the discussion progresses. These questions are not meant to constitute a definitive list of concerns to be addressed, nor is there a requirement to address every question.

### Incident Command System

- Describe the key benefits of using Incident Command System (ICS) & transitioning from a Single Command Structure to a Unified Command Structure?
- What are the Incident Commander/Unified Command's:
  - Priorities
  - Limitations and constraints
  - Incident objectives
- What would your organizational structure look like for a Worst-Case Discharge Scenario? (PSC, OSC, LSC, FSC, SOFR, PIO, LOFR)
- What are the safety hazards associated with this type of a response? How can they be mitigated? What are the air monitoring requirements? What other Safety resources would you consider bringing on to support the response?
- Who are the area stakeholders for this response? How will this response impact residents and businesses?

### Oil Spill Removal Organizations

- What type of booming strategies would you implement for the Texoma Lake? What recovery methods would be necessary?
- What would be your primary and secondary booming locations?
- What consideration would you make for Environmental Protection Strategies and/or Priorities?

# APPENDIX B: PLANNED EXERCISE SCHEDULE

	Day's Activities	
January 29, 2019		
8:00	Registration	
8:30	<b>STARTEX</b> Welcome, Introductions and Opening Remarks	
8:45	Module 1: INITIAL NOTIFICATIONS and ACTIVATIONS	
10:15	Break	
10:30	Module 2: INITIAL RESPONSE	
12:00	Lunch	
12:45	Module 3: RESPONSE MANAGEMENT SYSTEM	
14:15	Exercise Hot Wash / Closing Comments	
3:00	ENDEX	

# APPENDIX C: EXERCISE PARTICIPANTS

Participating Organizations		
Players		
Exercise Facilitators / Evaluators		
Doug Schuster	EMSI	
	EMSI	
0		
Ubservers		

Observers (Cont'd)		

# **APPENDIX D: ACRONYMS**

Acronym	Term
AAR	After Action Report
AST	Aboveground Storage Tank
DEQ	Department of Environmental Quality
DHS	U.S. Department of Homeland Security
EMA	Emergency Management Agency
EPA	Environmental Protection Agency
FRP	Facility Response Plan
HSEEP	Homeland Security Exercise and Evaluation Program
ICS	Incident Command System
IMT	Incident Management Team
LEPC	Local Emergency Planning Committee
LOFR	Liaison Officer
LSC	Logistics Section Chief
MEP	Master Exercise Practitioner
MSDS/SDS	Material Safety Data Sheet/Safety Data Sheet
NRS	National Response System
NSRC	Norfolk Southern Railway Company
OPA 90	Oil Pollution Act of 1990
OSC	Operations Section Chief
OSRO	Oil Spill Removal Organization
PHMSA	Pipeline and Hazardous Materials Safety Administration
PREP	Preparedness for Response Exercise Program
PIO	Public Information Officer
PSC	Planning Section Chief
SITMAN	Situation Manual
SMT	Spill Management Team
SOFR	Safety Officer
TTX	Tabletop Exercise
UC	Unified Command



# Inland Oil Spill Tabletop Exercise

# Hagerman National Wildlife Refuge, TX

After-Action Report

October 29, 2019

# TABLETOP EXERCISE OVERVIEW

Exercise Name	Inland Oil Spill Tabletop Exercise	
Exercise Date	October 29, 2019	
Scope	This was a Tabletop Exercise, planned for six (6) hours at the Hagerman National Wildlife Refuge Headquarters and Visitor Center, Sherman, TX. Exercise play was limited to the general operational and response actions of US Fish & Wildlife Service (USFWS) personnel and invited participants/agencies.	
Drill Core Components	<ul> <li>Notifications</li> <li>Staff / Contractor Mobilization</li> <li>Response Management System</li> <li>Source Control</li> <li>Assessment</li> <li>Containment</li> <li>Mitigation</li> <li>Protection</li> <li>Communications</li> <li>Documentation</li> </ul>	
Threat or Hazard	Hazardous Materials Response – Crude Oil	
Scenario	A tornado passes through Hagerman National Wildlife Refuge causing damage to several wells, storage, and containment. The damage results in oil flowing uncontrolled into the waters of Lake Texoma.	
Sponsor	Mary Maddux, USFWS Regional Oil & Gas Specialist; Region 2 Hagerman National Wildlife Refuge 6465 Refuge Road Sherman, TX 75020	
Participating Organizations	Hagerman National Wildlife Refuge, US Fish and Wildlife Service staff (USFWS), Environmental Protection Agency (EPA), US Army Corps of Engineers-Texoma Lake Office (USACE), Texas Parks and Wildlife Department (TPWD), Texas Railroad Commission (RRC), Texas Commission on Environmental Quality (TECQ) and Grayson County Office of Emergency Management (GCOEM) A complete roster of participants is provided in Appendix C.	
Exercise Coordinator	Mr. Doug Schuster, CET, MEP, CSM Cell: (904) 868-1490 Email: doug.schuster@emsics.com	

## **GENERAL INFORMATION**

The objectives and aligned core components were guided by the Emergency Response Plan (ERP) and Operations Manual requirements and selected by the Exercise Planning Team for this exercise. The ERP and the Facility Operations Manual were made available to all exercise participants.

### **Regulations and Policy Letters**

50 CFR § 29.32 50 CFR § 29.111 (b) 50 CFR § 29.121 (d)

The Oil Pollution Act of 1990 The National Contingency Plan The National Response Plan Federal Water Pollution Control Act

## **Exercise Objectives and Core Components**

The following OPA90/PREP exercise objectives described the expected outcomes for the exercise. The objectives were linked to PREP core components, which were distinct critical elements necessary to achieve an effective response. The objectives and aligned core components were guided by the 2016 EPA and OPA90/PREP requirements and selected by the Exercise Planning Team for this exercise.

The Incident Management Team (IMT) demonstrated:

- 1. Knowledge of the RESPONSE PLANS plan.
- 2. Knowledge of proper notifications.
- 3. Communication system processes.
- 4. Ability to access an Oil Spill Removal Organization (LEASE OWNERS).
- 5. Coordination of internal organization personnel with responsibility for spill response.
- 6. Review the transition from a local team to a regional team.
- 7. Knowledge of response coordination with the National Response System (NRS) to include the EPA and/or Coast Guard, state and local response agencies.
- 8. Ability to access information from the RESPONSE PLANS Plan for location of sensitive areas, response strategies, and for the recovery and disposal of spilled product.

## **Participant Roles and Responsibilities**

The term *participant* encompassed many groups of people, not just those playing in the exercise. Groups of participants involved in the exercise, and their respective roles and responsibilities, were as follows:

- **Players.** Players were personnel who had an active role in discussing or performing their regular roles and responsibilities during the exercise. Players discussed or initiated actions in response to the simulated emergency.
- **Observers.** Observers did not directly participate in the exercise. However, they supported the development of player responses to the situation during the discussion by asking relevant questions or providing subject matter expertise.
- **Facilitators.** Facilitators provided situation updates and moderated discussions. They also provided additional information or resolve questions as required. Key Exercise Planning Team members also assisted with facilitation as subject matter experts (SMEs) during the exercise.
- **Evaluators.** Evaluators were assigned to observe and document certain objectives during the exercise. Their primary role was to document player discussions, including how and if those discussions conformed to plans, polices, and procedures.

## **Exercise Structure**

This exercise was a facilitated discussion-based exercise by USFWS personnel. Each phase began with a written update that summarized key events occurring within that time period. After the updates, participants reviewed the situation and engaged in a group discussion on appropriate response and recovery issues.

Players participated in the following three phases:

Phase 1: Initial Notifications and Activations

- Initial Responders
- Response Management
- Oil Spill Removal Organizations

### Phase 2: Initial Response

- Initial Responders
- Response Management
- Oil Spill Removal Organizations

Phase 3: Response Management System

- Unified Command
- Command Staff Safety, Public Information (Affairs) and Liaison
- General Staff Operations, Planning, Finance, Logistics

## **Exercise Guidelines**

- This exercise was held in an open, low-stress, no-fault environment. Varying viewpoints, even disagreements, were expected.
- Responded to the scenario using your knowledge of current plans and capabilities (i.e., you may use only existing assets) and insights derived from your training.
- Decisions were not precedent setting and may not have reflected your organization's final position on a given issue. This exercise was an opportunity to discuss and present multiple options and possible solutions.
- Issue identification was not as valuable as suggestions and recommended actions that could improve plans & procedures. Problem-solving efforts should have been the focus.

## **Exercise Assumptions and Artificialities**

As in any exercise, assumptions and artificialities were necessary to complete play in the time allotted and/or account for logistical limitations. Exercise participants accepted that assumptions and artificialities are inherent in any exercise and did not allow these considerations to negatively impact their participation. During this exercise, the following applied:

- Normal drainage routes allowed a worst-case discharge scenario from the large oil storage tanks and wells to travel off site and into the Lake Texoma.
- The exercise was conducted in a no-fault learning environment wherein capabilities, plans, systems, and processes were evaluated.
- The exercise scenario was plausible, and events occurred as they were presented.
- All players received information at the same time.

## **Exercise Evaluation**

Data for the evaluation of the exercise was collected via evaluator notes and also during a facilitated hot-wash where participants were asked to describe the following:

- What went well?
- What did we learn?
- What do we need to learn more about?
- What can we do to improve the plan?
- What should be exercise next time?

Lessons Learned and recommendations were collected, analyzed and summarized by the exercise coordinator after the "hot-wash." They are grouped into four major areas:

- Planning,
- Incident Management Team,
- Resource Management, and
- Exercise Format/Scenario.

Specific recommendations for the Improvement Plan and tracking are listed in Appendix A of this report.

# TABLE TOP EXERCISE (TTX) STRENGTHS AND AREAS FOR IMPROVEMENT

## Planning

The strengths and areas for improvement for each core component aligned to this objective are described in this section.

### Strengths

The capability level can be attributed to the following strengths:

**Strength 1:** During the course of the exercise, participants frequently referenced the Response Plans. As the discussions progressed, participants were quick to validate response actions against planning assumptions in the plans.

**Strength 2:** The exercise also served as a good forum to gain a better understanding of internal response plans and processes for notifications, resource management, and capabilities.

### **Areas for Improvement**

The following areas require improvement to achieve the full capability level:

**Area for Improvement 1:** There were no referenced Response Plans with regards to site specific current safe booming/protection strategies. The participating Lease Owners worked with the Hagerman Initial Response Personnel to identify assessable deployment locations. Teams provided specific detail during the exercise regarding spill response strategies and tactics that would be valuable to include in Response Plans.

**Recommendation 1-1:** Hagerman Personnel should coordinate with each Lease Owners spill response subject matter expert(s) that would be involved in a response at their facility to add detailed response strategies, tactics, and staging area requirements to developed Response Plans.

**Recommendation 1-2:** As a best practice, provide a current, working copy site specific Response Plan to each of the Lease Owners and OSROs. This will provide the Lease Owners immediate access to information if they deploy directly to a staging area or response site. Having this information readily available, they could use this tool during internal training and equipment deployment drills.

**Recommendation 1-3:** As a best practice, it is recommended that Response Plans include Global Positioning System (GPS) coordinates of all equipment deployment locations with corresponding pictures of the deployment sites. Also, identify potential booming strategies to protect resources at risk and environmentally sensitive areas with GPS coordinates.

### **Incident Management**

The strengths and areas for improvement for each core component aligned to this objective are described in this section.

### Strengths

The capability level can be attributed to the following strengths:

**Strength 1:** A majority of the participants stated that they gained a stronger understanding of basic ICS principles and with position specific IMT roles and responsibilities. There was a good discussion of how outside response agencies could integrate and contribute to the existing IMT.

**Strength 2:** Participants demonstrated strong teamwork, open communication, and collaboration. Throughout the exercise, players maintained a positive attitude with a mutual goal of safety and an effective response.

**Strength 3:** The layout of the groups and the designed activities allowed for a very productive discussion within each team. For example: The Incident Commander/Qualified Individual discussed incident objectives and priorities; the Lease Owners were able to validate various spill clean-up tactics and what spill response equipment would be required.

### **Areas for Improvement**

The following areas require improvement to achieve the full capability level:

**Area for Improvement 1:** While play for the exercise was limited to a discussion based TTX, participants were eager to learn the ICS-201 Incident Briefing form. They were also interested in continuing the discussion and validation of operational response booming and protection strategies.

**Recommendation:** Recommend setting up future training and/or exercise opportunities that would allow Lease Owners and response personnel and the Hagerman IMT to coordinate with state, local, and federal responders. This would allow personnel involved in response activities the experience of working through the planning process and the development of an Incident Action Plan.

**Area for Improvement 2:** For some participants, this was their first exposure to the Incident Command System and it was a good learning experience. However, it is recommended they be provided the opportunity to attend additional ICS training sessions to become more comfortable in their roles, (specifically an Incident Commander Course for NWR personnel).

**Recommendation:** The Emergency Management Institute (EMI) offers a host of free self-paced courses designed for people who have emergency management and response responsibilities and the general public. It is recommended that Hagerman personnel take the online ICS-100 Introduction to ICS and ICS-200 ICS for Single Resources and Initial Action Incidents training that is offered by EMI (Link: <u>http://training.fema.gov/is/</u>).

### **Resource Management**

The strengths and areas for improvement for each core component aligned to this objective are described in this section.

### Strengths

The capability level can be attributed to the following strengths:

**Strength 1:** A majority of the participants felt the exercise provided everyone with a stronger understanding of resource requirements and availability. It also identified what limitations and constraints that may be placed upon Hagerman personnel and the Lease Owners in the event of a worst-case discharge.

**Strength 2:** Participants learned about the staffing and capabilities of the various teams/personnel from within Hagerman and both Lease Owner's. In addition, the discussion identified what response agencies would be brought in to support a worst-case discharge response at the NWR.

#### **Areas for Improvement**

The following area requires improvement to achieve the full capability level:

**Area for Improvement 1:** For a worst-case incident there are many agencies and stakeholders that need notifications. Also, there was some confusion on who was responsible for contacting the NRC upon discovery of an incident.

**Recommendation:** Whomever discovers the incident must immediately notify the NRC (1-800-424-8802), whether by Lease owners or Hagerman personnel.

Develop a comprehensive list for notifications and attach to the oil spill notification form. Some that were identified during the exercise were: Fish & Wildlife, TCEQ, Railroad Commission, EPA, Grayson County OHP, Corps of Engineers, Fire Departments, and Pottsboro Airport Fire Dept.

### **Exercise Format & Scenario**

The strengths and areas for improvement for each core component aligned to this objective are described in this section.

### Strengths

The capability level can be attributed to the following strengths:

**Strength 1:** All participants felt the scenario was realistic. The format of the facilitated discussion based TTX provided an excellent forum for sharing information, collaboration, and seeking clarification by all participants.

**Strength 2:** While working in teams for the facilitated team activities/discussions, participants delved into more role specific discussions.

**Strength 3:** For all of the responders that attended, the format provided a solid learning experience and increased confidence for their roles in a response.

**Strength 4:** The equipment deployment drill provided an opportunity for Hagerman personnel to understand booming terminology, operations, and techniques that would be deployed during an actual incident or event.

### **Areas for Improvement**

The following areas require improvement to achieve the full capability level:

**Area for Improvement 1:** Since this exercise was based on a worst-case discharge scenario, it is recommended that participants see the benefit of using this type of response structure for a small or medium discharge within the NWR during their normal day-to-day activities.

**Recommendation 1:** Recommend that future training and exercises be delivered to further develop the incident management skills of NWR personnel. If intermediate or advance ICS training is made available, the objectives for the next annual TTX or full-scale exercise should include a requirement to develop an ICS Form 201.

**Area for Improvement 2:** Future Exercises should incorporate an actual on water deployment of boom and recovery equipment.

**Recommendation 1:** Future tabletops and deployment should include the development of detailed booming strategies (deflection, collection, and recovery), then exercise that capability.

# **APPENDIX A: IMPROVEMENT PLAN**

This Improvement Plan has been developed specifically for Hagerman National Wildlife Refuge as a result of an Exercise conducted on 29 October 2019.

Area for Improvement	Recommendations	Primary Responsible POC
1. Planning	Conduct an audit review and update of any NWR site specific Response Plans. Make enhancements to align with Best Management Practices, including but not limited to:	NWR Personnel with help from Lease Owners
	Updated contact information.	
	<ul> <li>GPS locations, pictures, booming and response strategies.</li> </ul>	
	<ul> <li>The deployment locations identified in the Tabletop</li> </ul>	
2. Planning	<ul> <li>Create a Multi-Year Training &amp; Exercise Plan for future equipment deployment drills, exercises and training with the Lease Owners.</li> </ul>	NWR Personnel
	<ul> <li>Provide copies of developed site-specific Response Plans to each organization.</li> </ul>	
3. Planning	Tabletop Feedback: Participants wanted extra learnings on:	NWR Personnel
	<ul> <li>ACP, RCP &amp; RESPONSE PLANS</li> <li>TWPD Habitat lists</li> <li>Protection Strategies</li> <li>Identifying Lines for ownership</li> <li>Government Shutdown Notifications</li> </ul>	

4. Planning	Tabletop Feedback: Command wants to document, train and exercise on the following topics:	
	<ul> <li>Brine topics, Drainage to soil and vegetation, flushing hazards, soil types i.e. hard pan, RQ reportable Quantities,</li> <li>Refuge Admin Act</li> <li>219D Rule 2016</li> <li>Oil Aquatic Wildlife</li> <li>NERDA</li> <li>Cultural Resource Survey</li> </ul>	

# **APPENDIX B: EXERCISE PARTICIPANTS**

Participating Organizations		
Players		
Patrick Navratil	Jetta Operating	
Norman Boren	Jetta Operating	
James Vincent	US Army Corps of Engineers – Texoma Lake	
Paul Balkenbush	USFWS	
Colton Reese	Jetta Operating	
Mark Pike	Grayson Operating	
Pedro Ramirez	USFWS	
John Martin	EPA R6	
Mary Maddux	USFWS	
Samantha Allison	Grayson County OEM	
Mark Rich II	BLS Production Co.	
Michael Smith	BLS Production Co.	
Monta Sewell	Atoka Operating	
Gene Senek	Branch Energy Partners	
Alvie Griffin	Branch Energy Partners	
Jonathon Smith	Branch Energy Partners	
Exercise Facilitators / Evaluators		
Doug Schuster	EMSI	
Karl Breedlove	EMSI	
Observers		

# **APPENDIX C: ACRONYMS**

Acronym	Term
AAR	After Action Report
AST	Aboveground Storage Tank
DEQ	Department of Environmental Quality
DHS	U.S. Department of Homeland Security
EMA	Emergency Management Agency
EPA	Environmental Protection Agency
HSEEP	Homeland Security Exercise and Evaluation Program
ICS	Incident Command System
IMT	Incident Management Team
LEPC	Local Emergency Planning Committee
LOFR	Liaison Officer
LSC	Logistics Section Chief
MSDS/SDS	Material Safety Data Sheet/Safety Data Sheet
NRS	National Response System
HNWR	Hagerman National Wildlife Refuge
OPA 90	Oil Pollution Act of 1990
OSC	Operations Section Chief
OSRO	Oil Spill Removal Organization
PHMSA	Pipeline and Hazardous Materials Safety Administration
PREP	Preparedness for Response Exercise Program
PIO	Public Information Officer
PSC	Planning Section Chief
SITMAN	Situation Manual
SMT	Spill Management Team
SOFR	Safety Officer
ТТХ	Tabletop Exercise
UC	Unified Command