

AAI COMPONENTS and ASTM E1527-13 for PHASE I ASSESSMENTS

1.0 AAI COMPONENTS (Source: 40 CFR Part 312, Nov. 1, 2005).

1.1 *Duties of Environmental Professional (EP)*

- (a) Environmental inquiry
- (b) Visual inspections of the facility and adjoining properties
- (c) Interviews with past and present owners, operators and occupants
- (d) Reviews of historical sources
- (e) Reviews of federal, state, tribal and local government records

1.2 *Duties of “User” or “Owner” (can be delegated to EP)*

- (a) Searches for recorded environmental cleanup liens
- (b) Consideration of “specialized knowledge” of the subject property and adjoining properties
- (c) Consideration of the relationship of the purchase price to the value of the property, if not contaminated

1.3 *Duties Shared by EP and “User”*

- (a) Consideration of commonly known information about the property
- (b) Consideration of the "degree of obviousness of pollution”

2.0 AAI EP STATEMENT REQUIREMENT

AAI requires that EP’s place this statement in the Phase I and sign it. I declare that to the best of my professional knowledge and belief, I meet the definition of Environmental Professional as defined in Section 312.10 of this part. I have specific qualifications based on education, training, and experience to assess a property of the nature, history and setting of the subject property. I have developed and performed the all appropriate inquiry in conformance with the standards and practices set forth in 40 CFR Part 312.

3.0 OK CORP COMM O&G SPECIFIC AAI – PHASE I CONSIDERATIONS

3.1 *Environmental Issues*

If a possible environmental problem (evidence of a spill, staining, odor, dead vegetation training from and E&P site, etc.) is seen, perform some confirming work (i.e. a Limited Assessment [see the Commission’s Guardian Guidance], or soil samples analyzed for TPH in a stained area or salinity analysis in a bare spot, or vapor screening to below a

tank or line leak, or a pass with EM equipment to see if a bare spot at an O&G site has the conductivity typical of a produced water/brine spill) - but not the rigor of a Phase II.

3.2 Assessments

The parties performing the initial assessment(s) can

- (a) choose to defer detailed reviews and record checks until a basic physical pollution assessment of the site is done, and
- (b) if no significant pollution is found may decide to not perform these detailed reviews and record checks and instead ask that the case be dismissed or a NFA determination be made for the site.

3.3 Agricultural Areas

In Agricultural areas outside of towns and cities, where the only non-Ag use of property was O&G exploration and/or production, the following will satisfy AAI elements in 1.1 (c)(d)(e), 1.2(a)(b) and 1.3 (a):

- (a) a check of Corp Comm records
- (b) interview E&P site operators & field hands at the time E&P activities have occurred for what they know about site-polluting activities, except for apparently abandoned sites where these cannot easily be located, and do
- (c) interview E&P land owners & property renters at the time E&P activities occurred for what they know about site-polluting activities, except for apparently abandoned sites where these cannot easily be located.

3.4 Property Values and Purchases

1.2 (c) will be waived for sites where:

- (a) no property transactions are occurring and
- (b) the only activity or “economic development” is returning a site to an existing use such as usable farm/ranch land or oil and gas production, or converting it to greenspace.

3.5 Abandoned Sites - RP Verification

Legal verification of whether or not the former operator(s) of an oil & gas or storage tank site can be identified and located for Responsible Party purposes will also have to be done for apparently abandoned sites.