

JUPITER PROJECT

EMERGENCY RESPONSE PLAN

1. OBJECTIVE

This Emergency Break Response Plan establishes the measures that will be implemented by Edge Cable Holdings USA, LLC (“Edge”) in the event of an accident, emergency, or other significant adverse event, including, but not limited to, a horizontal directional drill (HDD) break (an “Emergency”), during construction of the Jupiter subsea cable landing beach manhole and steel shore-to-ocean conduit on Lot 3200, Tierra Del Mar, Tillamook County, Oregon.

2. PROJECT DESCRIPTION

2.1 Overview of the Project

One (1) steel conduit will be installed by HDD from Lot 3200 to an off-shore Punch-out Location (POL) and will be used as a long-lasting protective conduit for the Jupiter fiber optic cable as it traverses from the POL to the Beach Manhole (BMH) installed on Lot 3200. The map below shows the approximate location of the POL, BMH and the HDD.

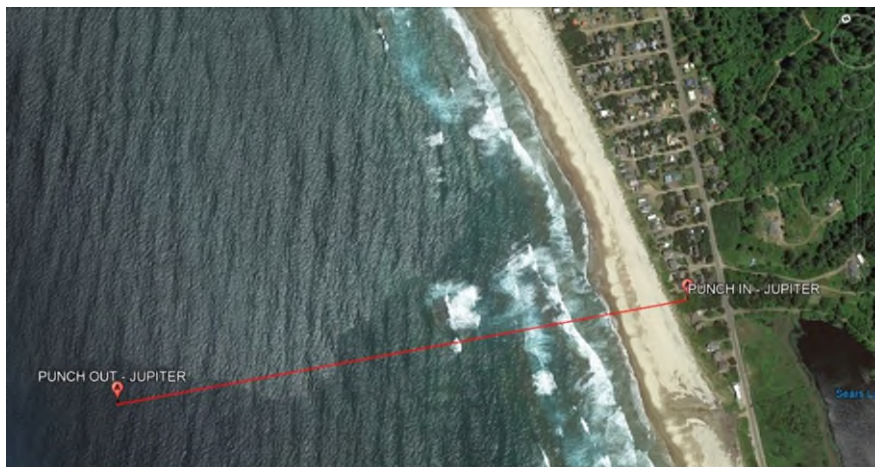


Figure 1: Project Location Map

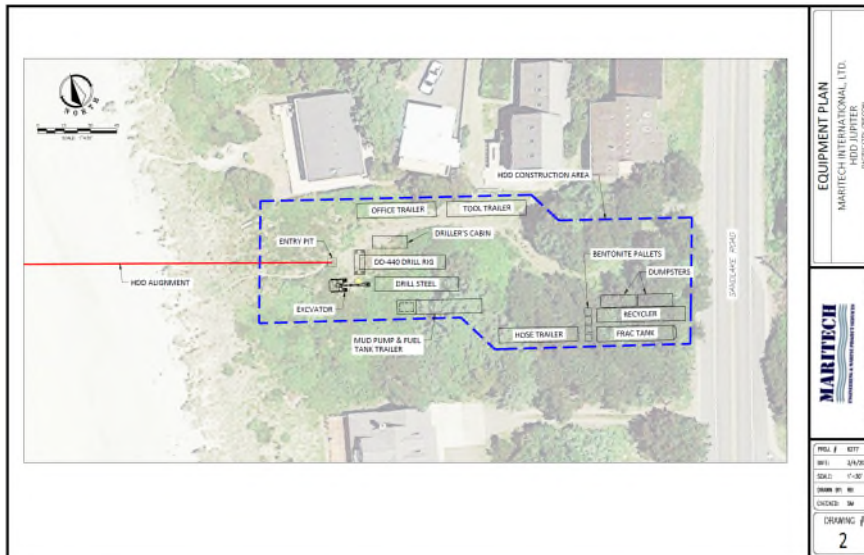


Figure 2: Drilling Area Overview

3. RESPONSE PLAN

3.1 Notification of County, State and Federal Agencies

In the event of an Emergency during construction on Lot 3200, Edge (or its designated representative, contractor or subcontractor) will notify the individuals listed in Table 3.1 below by phone and e-mail within twenty four (24) hours of the occurrence of the Emergency (the “Initial Notification”). Following the Initial Notification, Edge will submit a written report regarding the Emergency (the “Preliminary Report”) to the same individuals within three (3) business days following the occurrence of the break. The Preliminary Report will provide at least the following:

- Description of the Emergency, including the date, time and other material details regarding the incident;
- Description of the suspected root cause of the Emergency;
- Description of the immediate responsive action taken on-site;
- Description of the corrective actions taken to preclude recurrence of the Emergency and to prevent similar occurrences involving similar components or systems;
- Summary of all the third parties/agencies notified and preliminary responses from those parties.

Governmental Body	Individual Contact	Contact Information
Army Corp of Engineers	Kinsey Friesen	Kinsey.M.Friesen@usace.army.mil Office: 503-808-4378 Cell: 503-577-8298
Oregon Department of State Lands	Blake Helm	blake.helm@state.or.us Office: 503-986-5288 Cell: 971-701-1507
Oregon Parks and Recreation Department	Jay Sennewald	jay.sennewald@oregon.gov 542-563-8504

Oregon Department of Environmental Quality	Haley Teach	Haley.TEACH@state.or.us 503-229-5051
Tillamook County	Sarah Absher	sabsher@co.tillamook.or.us 503-842-3408x3317

Table 3.1

3.2 Corrective Actions Following an HDD Break

In the event of an HDD break, the following corrective actions will be taken:

- HDD operations will stop immediately.
- The HDD operator will attempt to pull-back and fish-out the broken drill string with an appropriate “fishing” tool, guided back into the drill profile to the break location. Fishing tools use the principle of one-way grip designed to slide over the broken drill string and latch on to the broken drill pipe. See Figure 4 below for images of “Fishing” tools that may be utilized. All attempts to recover the broken drill string will occur during approved hours for construction on Lot 3200.
- The HDD operator will contain any released drilling fluid (see Section 3.3 below).
- The HDD operator will create an incident report that documents the break and that includes photographs of the break and details regarding the break, such as location, activity in progress, drilling parameters, personnel involved and mitigating actions to be taken.



Figure 4: Examples of Types of Fishing Tools

3.3 Drilling Mud Releasesⁱ

Inadvertent Release

The drill operator will be equipped with a tracked hydraulic excavator, straw or hay bales, stakes to secure bails, silt fence, sandbags, shovels, pumps, and any other materials or equipment necessary to contain and clean up inadvertent releases of drilling mud caused by an HDD break. Ancillary items that will be readily available during drilling operations include a light tower in case clean-up operations are needed after dark.

Clean-up of Releases

The drill operator will promptly remove all visible drilling mud located in accessible areas. Removal methods will vary based on the volume of the release and the site-specific conditions. Removal equipment may include vacuum trucks, loader and track hoe buckets, small pumps, shovels and buckets. After removal of the released drilling fluid, the release area will be returned to its original condition to the greatest extent possible.

ⁱ The requirements for the use and recovery of HDD drilling mud on Lot 3200, and Edge's plans for addressing inadvertent releases of drilling mud from Lot 3200, were provided and incorporated into the original permitting for the Jupiter project. This section is intended to highlight Edge's existing obligations, and is not intended to alter or replace those obligations.