

Alaska

Regulations for Oil and Gas Operations in H₂S Areas

1. Are there any devices/alarms required of operators that have H₂S on location, and if so, at what ppm H₂S are they required to be set?

Yes, low level alarm at 10 ppm, high level alarm at not more than 20 ppm. [20 AAC 25.066(a)(8)]

2. Are there any postings required of operators that have H₂S on location, and if so, under what circumstances?

Operator must comply with the requirements of API RP 49, "Recommended Practices for Safe Drilling of Wells Containing Hydrogen Sulfide" [20 AAC 25.065(b)]

3. How are facilities at which H₂S is present tracked?

AOGCC does not track facilities and locations identified as H₂S present.

4. What level or levels of H₂S are considered actionable and under what circumstances?

Refer to #1 above. AOGCC typically does not enter facilities except for some meter inspections. At production and drilling locations, operators have gas detector with both visual and audible alarms. Gas checks are done by the operator accompanying an Inspector before entry into an enclosed space.

5. Are any additional standards for rules implemented for H₂S other than the following?
 - a. ANSI- American Nation Standards Institute.
 - b. API – American Petroleum Institute.
 - c. EPA – Environmental Protection Agency.

Most operators and contractors working on the North Slope of Alaska follow the Alaska Safety Handbook – a consortium developed standards of conduct and "best" safety procedures that guide daily efforts. The Alaska Safety Handbook procedures meet or exceed the standards set by ANSI, API and EPA.

6. Does your state have any specific H₂S safety regulations? If so, please list them below.

Refer 20 AAC 25.065 ("Hydrogen sulfide") and 20 AAC 25.066 ("Gas detection"). Also, AOGCC regulation 20 AAC 25.527(c) ("General well control requirements for drilling, completion, workover, and service operations") incorporates by reference API RP 59, *Recommended Practice for Safe Drilling of Wells Containing Hydrogen Sulfide*

7. What are the purposes of the H₂S regulations?
 - a. Public safety
 - b. Worker safety
 - c. Other: _____

Regulations are for “a”, “b”, and “c” (equipment integrity, which ensures “a” and “b”)

Safety Procedures for Field Inspectors

8. What type of training is required for Field Inspectors?

AOGCC Field Inspectors participate in the same H₂S awareness training that company operating personnel are required to complete.

9. Are certifications required for Field Inspectors?

Inspectors are given a card that proves they completed the training program.

10. Do you have an, and if so, what is the specialist’s level of expertise?

AOGCC does not employ a H₂S safety specialist.

11. Do state inspectors check, or do they require operators to check?

AOGCC Inspectors are not equipped to; they are accompanied by operator field personnel that check H₂S levels before entry to an enclosed area.

12. If state inspectors check H₂S levels, what are the required procedures/protocols for checking to determine H₂S levels?

See #11

13. How often are readings required to be made? By whom? How/who keeps up with those readings?

See #11

14. Where are Field Inspectors most likely to check for H₂S?
 - a. Top of stock tanks
 - b. Wellheads
 - c. Gas streams
 - d. Other: _____
 - e. Not applicable

During AOGCC inspections, if H₂S were encountered it would most likely be inside a wellhouse, or a drilling or workover rig.

15. How do Field Inspectors respond to an H₂S complaint? (Please include in the response information on any requirements about when the Field Inspector must be accompanied by another person.)

AOGCC has not received any complaints about H₂S.

16. Are inspectors required to wear H₂S monitors? If so, what type of equipment?

Yes, AOGCC Inspectors wear H₂S monitors for all inspections at drillsites, production pads, offshore platforms, and facilities. Monitor used is Honeywell BW Clip Single Gas Detector.