

Arkansas

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?

Operators subject to Commission Rule B-41 must have H₂S detectors on site and have electronic emergency shut-in devices. All devices must be tested annually.

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

Operators subject to Commission Rule B-41 must have signage posted at entry ways/access roads leading to the well location, on the well location and along any pipeline right of ways indicating the potential presence of H₂S and danger.

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

AOGC staff review annual forms submitted in accordance with Commission Rule B-41 and periodically inspect those facilities.

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

When H₂S is detected at 15ppm at any point on a radius of 100feet from the point of release or includes any portion of a public area.

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.

Commission Rule B-41 references RP-49 and RP-68 as guidance.

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

See Commission Rule B-41 attached to this survey for well/well site regulations and Commission Rule D-17 f) attached to this survey for pipeline regulations.

7. What are the purposes of the H₂S regulations?

- a. Public safety **YES**
- b. Worker safety **YES**
- c. Other: Provide regulatory oversight

Safety Procedures for Field Inspectors

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

All AOGC Field Staff and supervisors receive annual H₂S safety training in accordance with ANSI Z390.1-2017.

9. Are certifications required for Field Inspectors?

H₂S Certifications are required for all inspectors, and they receive an H₂S Certification card upon successful completion of the training.

10. Do you have an H₂S safety specialist, and if so, what is the specialist's level of expertise?

AOGC has an in-house trainer for H₂S safety who is certified as an H₂S certification instructor.

11. Do state inspectors check H₂S levels, or do they require operators to check?

Inspectors do not check levels. The annual submittal noted in item 3 above has this information.

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

NA

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

An annual submittal provided by each operator per item 3 above.

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

NA

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.)

All complaints are routed to the field supervisor. The complaint is reviewed, and the necessary action determined which may include contacting the operator, reviewing the annual submittal for that well or pipeline, contacting the complainant, scheduling a site inspection if immediate response is necessary. The supervisor will determine if the field supervisor and/or the inspector will jointly visit the site, depending if the will the operator will/or will not be present.

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

All field staff have H₂S personal monitors and are required to wear them at all times per AOGC field inspection policy. While on a location where H₂S is present they must also carry an escape air pack.

The H₂S monitors for inspectors currently in service are BW technology by Honeywell single gas H₂S (clip) monitors set at 10ppm and 15ppm.
The Supervisors have 4 gas monitors of the same brand (micro clip XL) for H₂S and other safety purposes.