

Illinois

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?

Not specifically, however, the Operating Requirements per Section 240.630(f) of 62 ILL.ADM.CODE state:

f) If hydrogen sulfide gas (H₂S) is present in excess of 20 ppm within 5 feet in any direction from the wellhead or the end of the flare line, the Department shall specify measures to be taken by the permittee to protect against waste and injury to the public health and safety, which may include the erection of flare lines, the posting of warning signs, and the erection of fencing. The Department may also require the setting of a temporary mechanical or cement plug during any period of time in which the well is not producing or during any period of time necessary to effectuate safety measures. In specifying the measures to be taken by the permittee, the Department shall consider the quantities of H₂S being emitted, the topographical and climatological features at the well site and the proximity of inhabited structures, public buildings, and public roads and railways.

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

Operating Requirements per Section 240.630(f) of 62 ILL.ADM.CODE state:

f) If hydrogen sulfide gas (H₂S) is present in excess of 20 ppm within 5 feet in any direction from the wellhead or the end of the flare line, the Department shall specify measures to be taken by the permittee to protect against waste and injury to the public health and safety, which may include the erection of flare lines, the posting of warning signs, and the erection of fencing. The Department may also require the setting of a temporary mechanical or cement plug during any period of time in which the well is not producing or during any period of time necessary to effectuate safety measures. In specifying the measures to be taken by the permittee, the Department shall consider the quantities of H₂S being emitted, the topographical and climatological features at the well site and the proximity of inhabited structures, public buildings, and public roads and railways.

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

Currently, there isn't a mechanism for tracking facilities at which H₂S is present other than the inspector being aware that hydrogen sulfide gas is present in excess of 20 ppm per signage if required.

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

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

No. Where API 1171 applies, in Illinois UNGS facilities signage notification is required in fields where H₂S is present.

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

At IDRN Office of Oil and Gas, Section 240.630(f) of 62 ILL.ADM.CODE is the primary reference to H₂S in terms of safety in the oil field and any obligations applicable to the PHMSA program regarding intrastate UNGSFs (signage/emergency preparedness/O&M manuals related to H₂S safety) coming through API 1171.

7. What are the purposes of the H₂S regulations?

- Public safety
- Worker safety
- Other: BOTH

Safety Procedures for Field Inspectors

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

Currently, knowledge of the regulations. In the past there may have been an H₂S awareness training. In recent months (pre COVID) had talks of the need to revive this training or consider implementing a 24-hour HAZWOPER training.

9. Are certifications required for Field Inspectors?

At this time, no safety certification is required for Field Inspectors at IDNR OOGRM.

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

At this time, there are no safety specialist at IDNR OOGRM.

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

Primarily, they would rely on operators to convey any know presence of H₂S gas.

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

The Operating Requirements per Section 240.630(f) of 62 ILL.ADM.CODE.

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

As stated above this is not currently tracked. In general, once readings are in excess of the 20 ppm per Section 240.630(f) of 62 ILL.ADM.CODE the OOGRM would most likely require the signage indicating H₂S may be an issue.

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

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.)

Currently there is no specific procedure in place to address this question other than with caution.

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

Inspectors have gas monitors available to them, typically a Ventis MX4 (CH₄ & H₂S).