

# Kentucky

## Regulations for Oil and Gas Operations in H<sub>2</sub>S Areas

1. Are there any devices/alarms required of operators that have H<sub>2</sub>S on location, and if so, at what ppm H<sub>2</sub>S are they required to be set?

None required under KY Oil and Gas statutes, but possibly under other occupational safety agencies.

2. Are there any postings required of operators that have H<sub>2</sub>S on location, and if so, under what circumstances?

None required under KY Oil and Gas statutes, but possibly required by other occupational safety agencies.

3. How are facilities at which H<sub>2</sub>S is present tracked?

There is no formal site tracking, sites are only known through regional knowledge of field inspectors and supervisors.

4. What level or levels of H<sub>2</sub>S are considered actionable and under what circumstances? If detectable by odor, or by meter.

A detectible level (by odor) is actionable on a citizen complaint to require leak repairs if an active operated well. An abandoned well releasing >10ppm would be a candidate for well plugging if an abandoned well.

5. Are any additional standards for rules implemented for H<sub>2</sub>S other than the following?
  - a. ANSI- American Nation Standards Institute.
  - b. API – American Petroleum Institute.
  - c. EPA – Environmental Protection Agency.

No

6. Does your state have any specific H<sub>2</sub>S safety regulations? If so, please list them below.

KY has no state specific H<sub>2</sub>S safety regulations.

7. What are the purposes of the H<sub>2</sub>S regulations?

- a. Public safety
- b. Worker safety
- c. Other: \_\_\_\_\_

N/A, KY has no specific H<sub>2</sub>S regulations.

## Safety Procedures for Field Inspectors

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

All KY O&G inspectors have been thru at least one H<sub>2</sub>S safety training class to become certified. Those in higher risk H<sub>2</sub>S areas generally continue that training on an annual basis.

9. Are certifications required for Field Inspectors?

Yes, but only the initial certification, not required to maintain that certification on annual basis. However, those in higher risk H<sub>2</sub>S areas, due to geology, are directed to continue the annual certification training.

10. Do you have an H<sub>2</sub>S safety specialist, and if so, what is the specialist's level of expertise?

No.

11. Do state inspectors check H<sub>2</sub>S levels, or do they require operators to check?

State inspectors are issued H<sub>2</sub>S meters to check levels as they deem necessary or prudent.

12. If state inspectors check H<sub>2</sub>S levels, what are the required procedures/protocols for checking to determine H<sub>2</sub>S levels?

Generally, just how to measure the H<sub>2</sub>S gas level based upon SG, and where to expect accumulations.

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

No specific requirements.

14. Where are Field Inspectors most likely to check for H<sub>2</sub>S?

- a. Top of stock tanks
- b. Wellheads YES**
- c. Gas streams
- d. Other: Yes, detectible leaks.**
- e. Not applicable

15. How do Field Inspectors respond to an H<sub>2</sub>S complaint? (Please include in the response information on any requirements about when the Field Inspector must be accompanied by another person.)

Inspector responds with H<sub>2</sub>S meter on automatic detect, and monitors environment as he approaches the well site if odor of H<sub>2</sub>S is detectable by odor, or if reported, or suspected based upon local geology.

16. Are inspectors required to wear H<sub>2</sub>S monitors? If so, what type of equipment?

No, N/A.