

Oklahoma

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

OAC 165:10-3-16 (i) Where the 100 ppm radius of exposure is 50 feet or greater shall be subject to following:

- Protective breathing equipment
- Wind direction indicators
- Automatic H₂S detection and alarm equipment

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

Yes

OAC 165:10-3-16 (c) (1-5) Storage tank provision. Measured one (1) foot above thief hatch exceeds 100 ppm.

- Warning sign located within 50' of the facility.
- A wind indicator located at the highest point of the tank battery.
- Fencing as a security measure is required when located in a populated area.

OAC 165:3-16(d) Drilling, completion, workover and production operations. All operators whose operations are subject to this Section, and where the 100 ppm radius of exposure is in excess of 50 feet, shall be subject to the following:

- Warning signs for fixed surface facilities and buried lines.

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

Data is gathered from 1002A (well completion report) and entered onto spread sheet. RBDMS H₂S inspection report filled out by field inspector.

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

- OAC 165:10-3-16(a) Each operator who conducts operations as described in this subsection be subject to this Section and shall provide sufficient safeguards to protect the general public from the occupational exposure limit of gas with a hydrogen sulfide content of 20 or more ppm and the immediate danger to life and health from a release of gas with a hydrogen sulfide content of 100 or more ppm.
- OAC 165:10-3-16 (c) (1-5) Storage tank provision. Measured one (1) foot above thief hatch exceeds 100 ppm.

- OAC 165:3-16(d) Drilling, completion, workover and production operations. All operators whose operations are subject to this Section, and where the 100 ppm radius of exposure is in excess of 50 feet.
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.

No.

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

OAC 165:10-3-16 Operation in hydrogen sulfide areas which mirror ANSI Z390.1.2017.
OAC 165:10-3-15 Venting and flaring.

7. What are the purposes of the H₂S regulations?
- a. Public safety
 - b. Worker safety
 - c. Other: Livestock and other animals.

Safety Procedures for Field Inspectors

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

Annual H₂S Safety Certification.
H₂S safety training at district meetings.

9. Are certifications required for Field Inspectors?

Yes.
Annual H₂S Safety Certification.

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

Yes.

- Total of 8 safety specialist, 2 for each of the four (4) district offices.

H₂S awareness training, H₂S instructor development class in accordance with 29 CFR 1910.1200 and ANSI Z-390.1-2017

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

Operators are required to check.

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?

No routine testing requirements.

For H₂S incident or complaints the safety specialist and or the field inspector will determine how often readings will be required and operator will be required to take them. Safety Specialist and field inspector will maintain readings.

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

b. Well heads

d. On the location.

At nearby residences.

On nearby roads or public access.

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 H₂S complaints will be responded to by a H₂S Safety Specialist and a Field Inspector

- Gathers accurate information from complainant concerning the incident:
- Name, phone number, email, and address of complainant.
- Lease Name, Legal Description if known, or directions.
- Whoever takes complaint contacts nearest H₂S Safety Specialist.
- Safety Specialist contacts Field Inspector and Supervisor.
- Verify the wind direction and wind speed of the incident site.
- Safety Specialist and Field Inspector meet upwind and off site.
- Check & clip on personal H₂S detectors.
- Once operator and well is known:
- Contact operator and find out what H₂S concentrations have been on site.
- Request someone with company meets you at site.
- Proceed as information allows.
- Safety Specialist contacts the Supervisor to report the findings.
- Supervisor will determine if the Public Information Officer needs notified.

- Safety Specialist works the initial complaint findings & recommendations of the incident and enters them in RBDMS.

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

Yes.

Gas Clip personal H₂S monitor set to go off at 10 ppm.

The personal monitor are bump tested by the safety specialist at least every other month.