

Texas

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, if concentrations are >100 ppm and the 100 ppm radius of exposure (ROE) is greater than 50 ft. and includes any part of a public area except a public road, the 500 ppm ROE is greater than 50 ft. and includes any part of a public road, or the 100 ppm ROE is >3,000 ft.

H₂S monitors are required for drilling and workover operations and at gas plants where the 100 ppm radius of exposure is 50 ft. or greater.

The RRC does not have requirements for what devices should be set at.

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

Yes, if concentrations are >100ppm, warning signs are required at entrances with public access and within 50 ft. of the battery.

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

Through the online H9 (H₂S certificate of compliance) system.

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

Anything over 100ppm is immediately actionable.

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.

16 TAC § 3.36 references the above-mentioned standards.

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

16 TAC § 3.36 is the State's H₂S safety rule.

7. What are the purposes of the H₂S regulations?

- a. Public safety

- b. Worker safety

- c. Other: _____

Safety Procedures for Field Inspectors

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

Annual Safety training that includes the hazards and characteristics of H₂S, safety precautions around H₂S, operation of H₂S safety equipment, and the effects of H₂S on materials used in the industry.

9. Are certifications required for Field Inspectors?

Yes

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

Yes, varying years of experience and additional training for those individuals.

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

Operators are required to check and report their own H₂S levels.

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

N/A- Inspectors DO NOT check for H₂S levels.

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

There are no requirements for how often levels should be checked. It is on the operator to be diligent in making sure reported levels are updated when/if needed.
H₂S concentration tests are required on new wells when they go on production and when there is a change of operator.

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.)

H₂S coordinator and the inspector for the county the complaint is in will respond together. Tools such as FLIR camera, 4 channel gas monitor & stain tubes may be used to determine where it is coming from and how much H₂S is in the air. TCEQ will also be notified since the RRC does not have any rules addressing non H₂S odor issues.

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

Yes, inspectors are required to wear personal H₂S monitors anytime they are in or around an H₂S environment. The monitors worn by all RRC inspectors are BW by Honeywell Clip Monitors. The low alarm is 10 ppm and high alarm is 15 ppm.