

West Virginia

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?

The well operator is required to provide information regarding the equipment and method used for the monitoring, detection, and warning of the presence of hydrogen sulfide gas during drilling, completion, and work-over operations, specifying the location of the monitoring and detection equipment.

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

The operator shall establish a method of notification to all residents and emergency response personnel who may be affected by specific events during the operation. Such events may include, without limitation, the presence of hydrogen sulfide gas, blow-outs, wet gas flowback periods, and flaring.

The operator is required to establish the method that will be used to notify the oil and gas inspector and the Chief of the presence of hydrogen sulfide gas and how the operator will control access to the same.

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

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

A detailed record of significant events, including without limitation lost circulation, the presence of hydrogen sulfide gas, fluid entry, kicks, and abnormal pressures. The operator shall immediately notify the oil and gas inspector of the presence of hydrogen sulfide gas at concentrations of ten parts per million (10 ppm) or greater or any blow-out or significant kick.

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.

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

WV Legislative Rule § 35CSR8-5.7

7. What are the purposes of the H₂S regulations?
- Public safety
 - Worker safety
 - Other: _ All applications for well work permits shall be accompanied by a well site safety plan to address proper safety measures to be employed for the protection of persons on the well site, as well as the general public in the area surrounding the well site.

Safety Procedures for Field Inspectors

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

Basic awareness training.

9. Are certifications required for Field Inspectors?

No, but the operator is required to provide the following:

A statement of the training to be provided or that has been provided to all personnel who will be involved in hydrogen sulfide operations and a list of the personal protective equipment (PPE) that will be maintained on the well site when in areas where hydrogen sulfide gas is likely to be encountered.

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

No.

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

Operators are responsible but inspectors can also check with the appropriate equipment.

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

Basic monitoring with a detector.

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

14. Where are Field Inspectors most likely to check for H₂S?

- Top of stock tanks
- Wellheads
- Gas streams
- Other: _____
- 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.)

The inspector would require the well operator to investigate with the appropriate equipment and the inspector would likely use a detector as well, as a secondary safety measure. If a leak was identified, the operator would be required to conduct the necessary repairs.

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

No.

A detector would be used if the inspector believed that H₂S could be present.