

**Proposed Rule 1148.2
Notification and Reporting
Requirements for Oil and Gas Wells
and Chemical Suppliers**

**Working Group Meeting
January 24, 2013**

Definitions (Subdivision (c))

- Added definition for “acidizing” (c)(1)
- Added definition for “gravel pack” (c)(6)
- Revised definition of “rework” (c)(11)
 - Based on DOGGR definition
 - Focus on drilling and deepening and permanent alteration of casing
- Revised definition for “well completion” (c)(16)
 - Includes gravel packing and well production stimulation activities
- Added definition for “well production stimulation activity” (c)(18)
 - Activity performed on a well to improve its productivity

Notification Requirements (Subdivision (d))

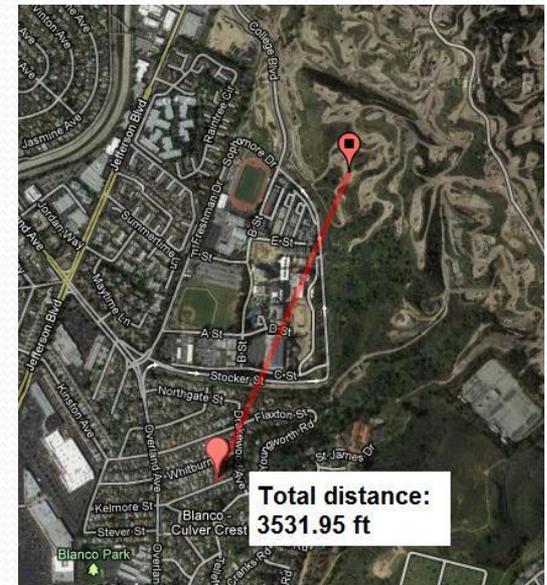
- **Comment:** Requiring notifications no less than 5 days could delay oil and gas operations
 - Notification time revised to “no more than 10 days and no less than 24 hours prior to the start of...” (d)(1)
 - Added provision to allow notification 48 hours AFTER drilling, well completion, and reworks if operations “...necessary to avert a threat to life, health, property, or natural resources...” (d)(3)

Notification Requirements (Subdivision (d)) (*Continued*)

- **Comment:** AQMD should refer to DOGGR notices submitted by industry instead of requiring duplicate reporting
 - Deleted requirement to submit of copies of DOGGR forms (d)(1)(F)
 - DOGGR did offer to send copies of *permits*
 - AQMD would receive after the activities were conducted
 - Could be substantial lag time – several months
 - Scanning occurs well after – could be up to 1½ years
 - AQMD maintaining notification requirement
 - Basic contact information and well location
 - Nearest sensitive receptor

Sensitive Receptor (d)(1)(D)

- Maintained definition of sensitive receptor (c)(12)
 - Consistent with most recent AQMD rules and CARB definition
- Maintained distance of 1,500 feet as distance for reporting sensitive receptor (d)(1)(D)
 - Review of complaint information revealed confirmed odor violations at distances up to 3,000 feet
- Revised requirement to include only the nearest sensitive receptor within 1,500 feet (d)(1)(D)(iv)



Sensitive Receptor

Definition	AQMD Rules
<p>SENSITIVE RECEPTOR means any residence including private homes, condominiums, apartments, and living quarters; education resources such as preschools and kindergarten through grade twelve (k-12) schools; daycare centers; and health care facilities such as hospitals or retirement and nursing homes. A sensitive receptor includes long term care hospitals, hospices, prisons, and dormitories or similar live-in housing.</p>	<ul style="list-style-type: none"> • Proposed Rule 1148.2 • Rule 1470 same definition with a separate definition for “school” • Rule 1420.1 (<i>adopted 11/5/10</i>) • Rule 1469 (<i>amended 12/5/08</i>)
<p>SENSITIVE RECEPTOR is a school (kindergarten through grade 12), licensed daycare center, hospital, or convalescent home.</p>	<p>Rule 1148.1 (<i>adopted 3/5/04</i>)</p>
<p>SENSITIVE RECEPTOR LOCATIONS include schools (kindergarten through grade 12), licensed daycare centers, hospitals and convalescent homes.</p>	<p>Rule 1426 (<i>amended 5/2/03</i>)</p>
<p>SENSITIVE RECEPTOR includes schools, public and private (kindergarten through grade 12), licensed daycare centers, hospitals, and convalescent homes.*</p>	<p>Rule 1469.1 (<i>amended 3/4/05</i>) Rule 1472 (<i>adopted 3/7/08</i>)</p>
<p>SENSITIVE RECEPTOR LOCATIONS include schools, daycare centers, hospitals, and convalescent homes.</p>	<p>Rule 1421 (<i>amended 12/6/02</i>)</p>

* Rules include separate definition for residential receptor. Residential receptor is similar.

Reporting Requirements (Subdivision (e))

- Extended the reporting period from 2 weeks to 30 days after completion of the last activity (e)(1)
- Combustion Equipment (e)(1)(C)
 - Revised to specify reporting for “combustion” equipment
 - Combustion equipment reporting to include engine “tier” rating (emission rate not needed)
 - Removed requirement to report PERP information
 - Difficult to research specific engine information through PERP program
 - Exemption added for combustion equipment rated 50 bhp or less

Reporting Requirements (Subdivision (e)) *(Continued)*

- Dry materials used for drilling, well completion, and rework activities (e)(1)(C)
 - Specified “...in which dry materials are added and mixed onsite into the drilling and well completion fluid(s)”
- Drilling fluids (e)(1)(D)
 - Removed requirement to report volume of drilling fluids used and recovered

Chemical Reporting Requirements

- **Comment:** The rule should include a “de-minimus” threshold for vapor pressure for reporting recovered fluids.
 - Staff is researching this issue
 - If a provision is added, periodic sampling/monitoring would be necessary
- **Comment:** Facilities should report the source of water used in drilling/well completion fluids
 - AQMD intends to conduct sampling of recovered fluids

Chemical Reporting Requirements (Continued)

- **Comment:** Can facilities submit Material Safety Data Sheets (MSDS) in lieu of reporting
 - Electronic reporting of chemicals is the preferred method
 - Allows for analysis of data
 - Allows for more efficient review and upload of data to AQMD website
- Added requirement to report contact information for chemical supplier(s)

Initial Comments

- **Comment:** Scope of proposed rule goes beyond the Board's original directive to evaluate Hydraulic Fracturing
 - Other sources included in the proposed rule have similar potential air quality impacts
 - Data and information is needed to assess potential emissions
 - Other AQMD rules have data gather provisions
 - AQMD staff will present findings to Governing Board
- **Comment:** AQMD should conduct a study of several well sites instead of the current regulatory approach.
 - Alternative approaches can be presented to the Board for their consideration
- **Comment:** Reworks are not part of "pre-production" activities
 - Rule title modified to reflect regulatory intent

Initial Comments *(Continued)*

- **Comment:** Existing AQMD/CARB rules may already apply
 - Review of existing rules found regulatory gaps for particulate, toxics, and hydrocarbon emissions from drilling, well completion, and rework operations
- **Comment:** Emissions from “pre-production activities” are minimal and a rule is not necessary to control these emissions
 - PR 1148.2 will collect information to confirm emissions and potential air quality issues, if any

Initial Comments *(Continued)*

- **Comment:** Coordination with DOGGR
 - AQMD is coordinating with DOGGR
 - Consulting with DOGGR
 - Briefing DOGGR on proposed rule
- **Comment:** Conduct technical workshop with industry experts and DOGGR to discuss the basics
 - AQMD staff is interested
- **Comment:** AQMD should review available studies on hydraulic fracturing (such as EPA and Environmental Defense Fund)
 - AQMD staff looking into these studies

Next Steps

- Public Workshop
January 30, 2013
2:00 PM, Auditorium
- Set Hearing
February 1, 2013
- Working Group Meeting
February 14, 2013
2:00 PM, GB
- Public Hearing
March 1, 2013