

## Rule 1148 Series Requirements for Oil and Gas Wells



Working Group Meeting No. 1 April 20, 2023 – 10:00 am

Zoom URL: <a href="https://scaqmd.zoom.us/j/91059546550">https://scaqmd.zoom.us/j/91059546550</a>

Dial In: 1 669 900 6833

Webinar ID: 910 5954 6550 (applies to all)

#### Agenda



## Background & Rule 1148 Series

#### South Coast AQMD Rule 1148 Series

Rules adopted to regulate oil field production sites:

Rule 1148 – Thermally Enhanced Oil Recovery Wells

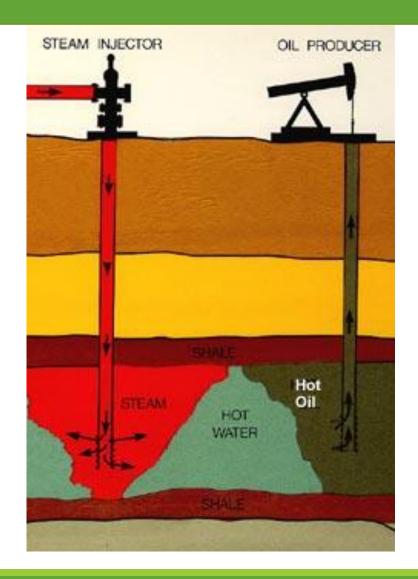
Rule 1148.1 – Oil and Gas Production Wells

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



#### Rule 1148 Requirements

- Adopted on November 5, 1982
- Established limits for VOC emissions on steam driven wells
- Steam driven wells combine oil production and steam injection wells
- Includes provisions if steam driven wells are connected to a vapor control system

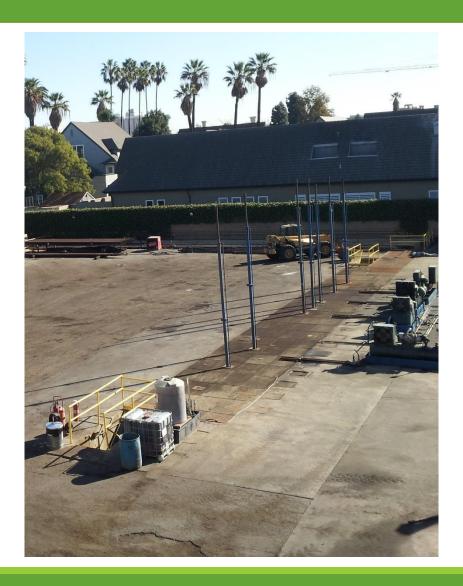


#### Rule 1148.1 Requirements

- Last amended on September 4, 2015
- Established to reduce VOC and toxic emissions from wellheads, well cellars, and handling of produced gas
- Includes Odor Mitigation Plan if following thresholds are met or exceeded
  - Notice of Violation for odor nuisance occurring on two or more days; or
  - Three confirmed odor events within previous six months



#### Rule 1148.1 Requirements (continued)



- Total Organic Compound (TOC) limit of 500 ppm in the well cellar
- Required to pump out or remove organic liquid accumulated in well cellar when depth exceeds 2 inches or TOC exceeds 250 ppm
- TOC limit of 250 ppm leak threshold for components of produced gas handling equipment located within 100 meters (~330 feet) of a sensitive receptor

#### Rule 1148.2 Requirements

- Last amended February 3, 2023
- Established informational requirements for oil or gas wells
- Notification when conducting well drilling, well completion, well reworks, injection well acidizing\*, chemical treatments\* and use of workover rig(s)\*
- Notification to no less than 72 hours\* prior to start of well activities (changed from 48 hours)
- Allows up to three 24-hour extensions\* when start date and time is anticipated to occur after the originally projected start date and time (reduced from five extensions)



<sup>\*</sup>New or amended requirements in 2023

#### Rule 1148.2 Requirements (continued)

- Includes reporting requirements for operators and chemical suppliers to disclose chemicals or products used
- Information regarding the operator, location, well number, date of activity, chemical or products, purpose, mass quantity is posted online and available for public viewing
- Future notifications will include a link to air toxic state agency website where public health information from specific chemicals can be found

#### Oil and Gas Well Electronic Notification and Reporting Rule 1148.2 - Notification and Reporting Requirements for Oil and Gas Well and Chemical Suppliers was adopted on April 5, 2013. Effective June 4, 2013, oil and gas well operators and chemical suppliers are required to electronically submit to the South Coast AQMD various types of reports related to well drilling, well completion, and well reworks. In addition, the South Coast AOMD is required to make certain information regarding these activities available to the public. Click on a tab below to access either of the Notification and Reporting or Public Information portals. Operators Notification and Reporting Portal - Create and manage account **Chemical Suppliers** - File notifications and reports Public Information Portal - View well activity information and Community chemical usage Members - Sign up to receive emails for well event notifications Rule 1148.2 Implementation Status Reports - Current and past reports

Rule 1148.2 Notification website: <a href="http://www.aqmd.gov/home/rules-compliance/compliance/1148-2">http://www.aqmd.gov/home/rules-compliance/compliance/1148-2</a>

# Community Concerns & Considerations

#### Assembly Bill 617



South LA

Requires air districts to create Community Emissions Reduction Plans (CERPs) for designated communities

Requires strategies to be developed to reduce toxic air contaminants and criteria air pollutants in disadvantaged communities

Two communities selected

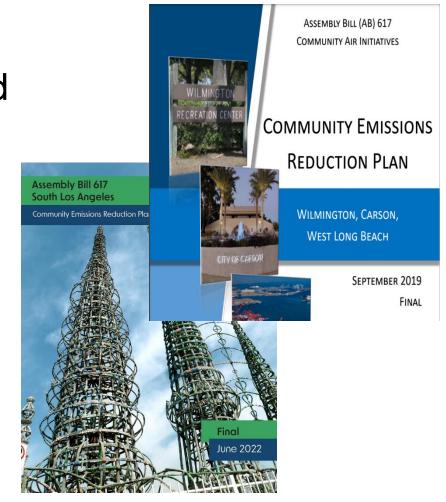
- \* South Los Angeles (SLA)
- \* Wilmington, Carson, & West Long Beach (WCWLB)



Wilmington, Carson and West Long Beach

#### AB617 and CERP

- AB617 Community Steering Committee (CSC)
   Meetings held in South Los Angeles (SLA) and
   Wilmington, Carson, and West Long Beach
   (WCWLB) areas
- Communities provided input to address local concerns
- Both WCWLB and SLA identified oil and gas production activity as an area of concern
- WCWLB CERP was adopted in 2019 and the SLA CERP was adopted in 2022



### WCWLB CERP Regarding R1148 Series

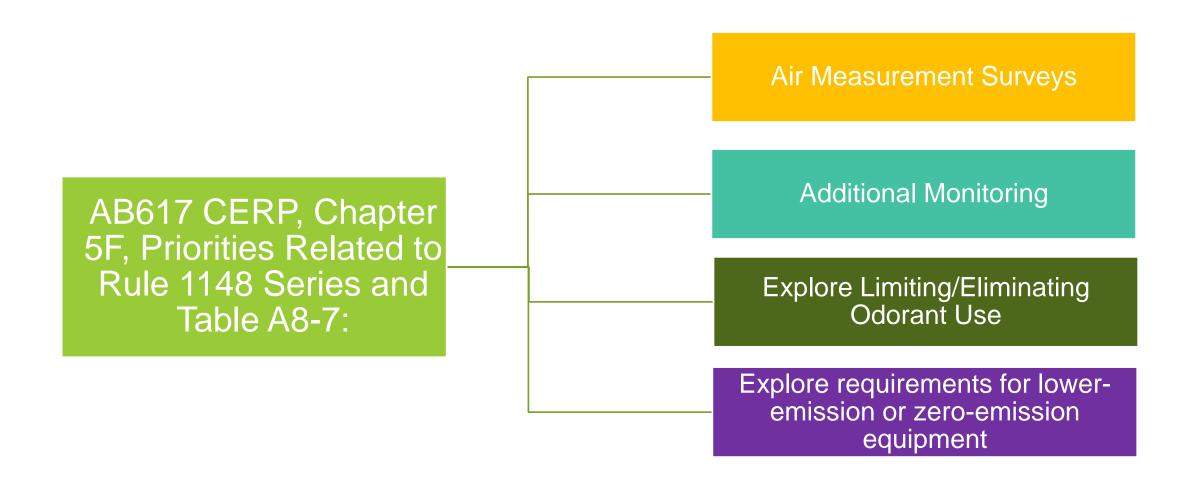
Chapter 5E -Actions to Reduce Community Air Pollution priorities: Focused near facility air measurements & inspections to address leaks & odors from oil drilling & production

Fenceline air monitoring

Vapor recovery systems & leak detection technologies

Lower or zero emission equipment for on-site operations

### SLA Draft CERP Regarding R1148 Series



#### Response to CERP Concerns







#### Staff to consider and evaluate:

- Use of enhanced leak detection technology
- Continuous monitoring at or near certain facilities
- Electrification of machinery and equipment used at oil production sites
- Odorant use, potential usage of odorless neutralizing agents, & limiting/banning of certain odorants
- Additional signage requirements

#### Follow-Up on Mailing Notifications

Staff has been directed by the Governing Board to:

- Follow up on the cost associated with mailing notifications
- Evaluate most effective means of communicating and/or preferences from the community
- Report back at Stationary Source Committee during summer of 2023



# Rule Development Process and Next Steps

#### Rule Development Process

Information Gathering – Meet with Stakeholders



Define Rule Objective and Scope

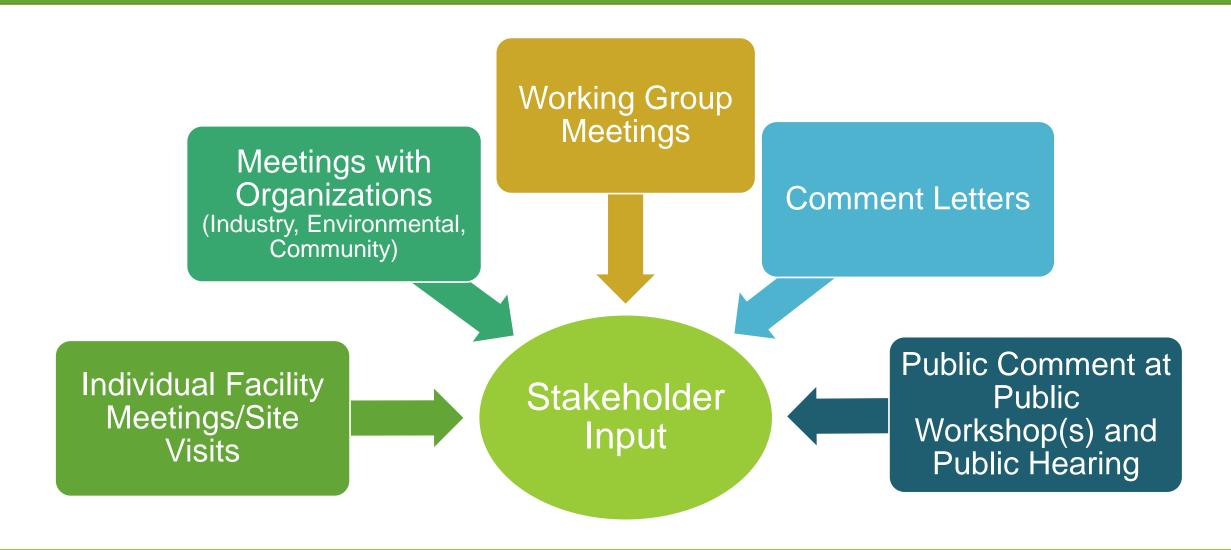


Develop Rule Concepts

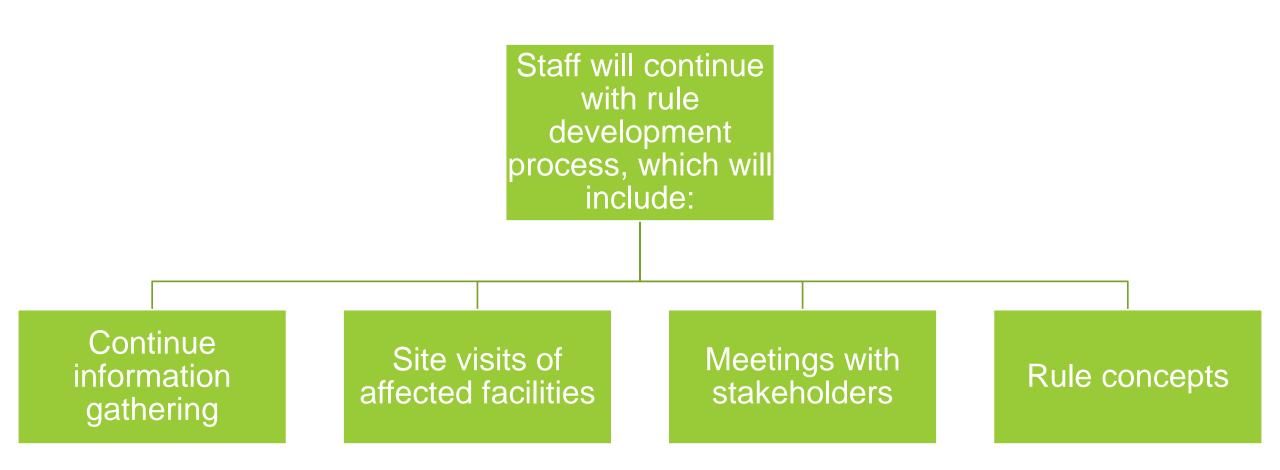


Draft Proposed Rule Language

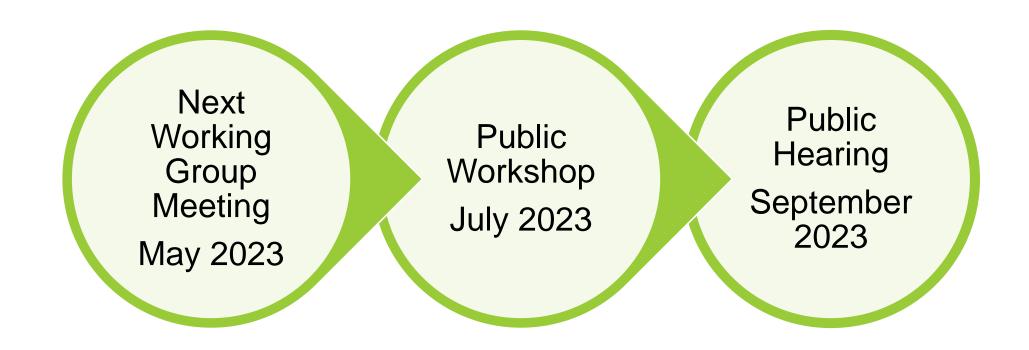
#### Stakeholder Input



#### Next Steps



#### Proposed Rule Schedule for PAR 1148.1



#### Staff Contacts

South Coast AQMD staff is available to assist you with any questions or comments



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