

Proposed Amended Rule 1148.2 Requirements for Oil and Gas Wells



Public Consultation Meeting #2 December 21, 2022 – 1:00 PM

Join Zoom Webinar Meeting - from PC or Laptop https://scaqmd.zoom.us/j/93588296076

Zoom Webinar ID: 935 8829 6076 (applies to all) Teleconference Dial In +1 669 900 6833 One tap mobile +16699006833,,93588296076#

Agenda

Summary of Public Consultation Meeting

Additional Community Concerns

Proposed Amended Rule Language Update

Next Steps

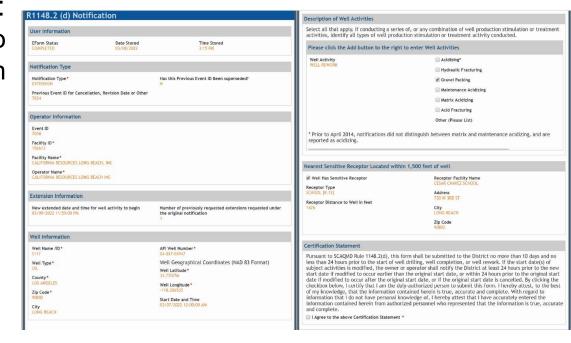
Summary of Public Consultation Meeting

12/21/2022

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Summary of Public Consultation Meeting

- In response to further actions requested during rule development:
 - Increased notification time from "no less than 48 hours" to "no less than 72 hours" prior to start of wellrelated operations
 - Reduced notification extensions to delay project from five to three
 - Adding additional CAS number integration into the notification system to reduce input errors
- Notification portal will be enhanced to generate annual report

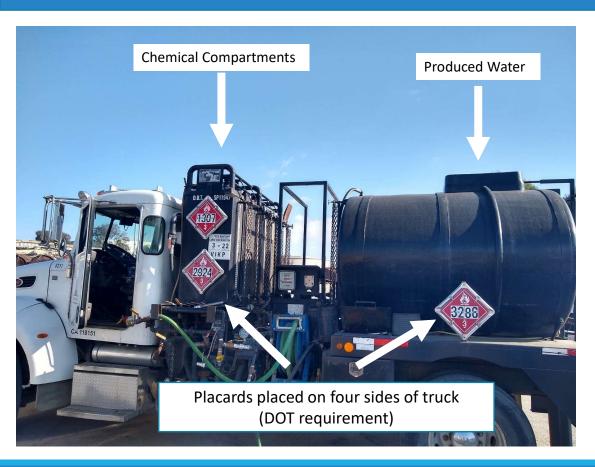


Additional Community Concerns After Public Consultation Meeting

Additional Community Concerns

Issue	Response
Concern that acidification jobs are occurring without proper notificationTrucks observed onsite by community stakeholders	Staff conducted multiple site visits at different oil and gas facilities to assess and evaluate issue • Chemical treatment is occurring (further details in later slides)
Written notifications must be provided to nearest sensitive receptors prior to start of acid jobs	Staff proposing additional requirement for written notifications be provided to the nearest sensitive receptors

Corrosion Inhibitor Use and Treater Trucks



- Standard required practice is to periodically apply chemical treatment to well casing to ensure stability
- Variety of chemical types are injected into the well casing to address corrosion, scaling, waxing, etc. by third party
- Chemicals transported on "treater trucks" in compartments (approximately 50-gallon capacity per compartment, 5-6 compartments total)
- Trucks also hold produced water in the larger tank (approximately 1,600-gallon capacity) that is used to help push the chemicals down the well

Chemical Injection Process

- At one site, staff observed injection of corrosion inhibitor in one well
 - Quantity typically is one to five gallons
 - Conducted in a closed loop system with hoses as shown
 - Frequency varies (weekly, biweekly, monthly) depending on condition of well casing
 - No odors detected while standing within 10 feet of well



Injection Process Inside Well Cellar

- For wells located inside a well cellar, treater trucks are parked in one location with multiple wells serviced one after another
- Activity can take up to 2 hours (depending on number of wells) instead of 15-20 minutes it would take to service one above ground well

bottom nected hose

Note: Red circle at bottom right indicates connected hose for corrosion inhibitor

treatment

On-Site Corrosion Inhibitor Use



- Staff observed on-site totes that contain chemicals, such as a corrosion inhibitor shown in this picture
- From the totes, directly injected into pipelines in an enclosed system
- Used to treat pipelines downstream as oil is sent from wells to storage tanks
- Daily usage ranged from approximately 1-5 gallons
- Refilled once a month on average

On-Site Chemicals Used

- Corrosion Inhibitors used to protect piping and prevent degradation of metal
 - Naphtha as main ingredient (precursor to gasoline)
 - Polymers used to separate oil from water
 - Sodium salt as a component
- Emulsifiers used to help combine oil and water
 - Naphtha as main ingredient



Proposed Amended Rule Language Update

Use of Maintenance Chemicals in Wells

- Propose updating Rule 1148.2 (d)(1) section
 - Address concerns that other maintenance activities are not being reported
 - Would require notification if abnormally higher volumes of chemicals are used beyond regular maintenance

Proposed rule language including new definition:

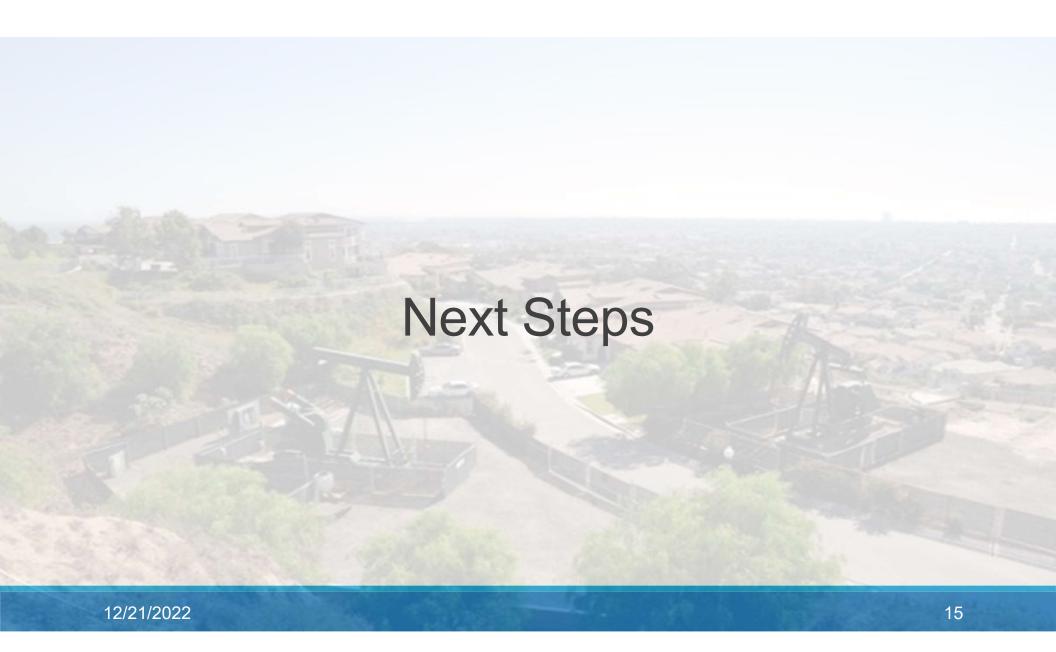
CHEMICAL TREATMENT means chemicals such as corrosion inhibitors used to prevent corrosion of pipes and tubing that are directly inserted into an oil and gas or injection well or pipelines. Chemicals used for acidizing are not applicable.

(d)(1) ... or conducting chemical treatment in quantities of fifty gallons or more, excluding water:



Proposed Rule Language for Hardcopy Notifications

- For oil and gas or injection wells located within 1,500 feet of a sensitive receptor
- Operator to send out a written notification to all sensitive receptors at least ten days prior to the commencement of an acidizing event
- Information in both English and Spanish
- Shall not apply to wells operated on islands located in either the Southern California Coastal Waters or Outer Continental Shelf Waters.



Next Steps for PAR 1148.2

Release 30-day Documents – January 4, 2023

Set Public Hearing – January 6, 2023

Stationary Source Committee – January 20, 2023

Public Hearing – February 3, 2023



Positions include Scientists, Policy Experts, Engineers, Inspectors, Chemists, Public Affairs, IT, Clerical and more!

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