

**BEFORE THE  
OIL CONSERVATION COMMISSION  
Santa Fe, New Mexico**

Case No. 12897 Exhibit No. 2

Submitted by OCD

Hearing Date 9/20/02

## OCD / OCC Proposed Rule Comparisons

| H <sub>2</sub> S Threshold Chart            | H <sub>2</sub> S ≥ 100 ppm | H <sub>2</sub> S ≥ 300 ppm in Tanks | PHV 500 ppm ROE Includes a Public Road | PHV 100 ppm ROE Includes a Public Area | ¼ mile of Public Area (**) |
|---|----------------------------|-------------------------------------|--|--|----------------------------|
| Personnel Protection & Training D&P         | XC                         |                                     | XC                                     | XC                                     |                            |
| Equipment Standards- (D&P)                  | XC                         |                                     | XC                                     | XC                                     |                            |
| Exemptions- (D&P)                           | XC                         |                                     | XC                                     | XC                                     |                            |
| Release Notification                        | XC                         |                                     | XC                                     | XC                                     |                            |
| Electronic Submission                       | XC                         |                                     | XC                                     | XC                                     |                            |
| Corrective Actions- (D&P)                   | XC                         |                                     | XC                                     | XC                                     |                            |
| API Standards- (D&P)                        | X                          |                                     | XC                                     | XC                                     |                            |
| Minimum Standards                           |                            |                                     |  |  |                            |
| • Egress Route- (D)                         | X                          |                                     | XC                                     | XC                                     |                            |
| • Safety, Detection & Monitor Equipment-(D) | X                          |                                     | XC                                     | XC                                     |                            |
| • Wind Indicators- (D&P)                    | X                          |                                     | XC                                     | XC                                     |                            |
| • Signs- (D&P)                              | XC                         |                                     | XC                                     | XC                                     |                            |
| • Flare Systems- (D)                        | X                          |                                     | XC                                     | XC                                     |                            |
| • Secondary Well Controls- (P)              |                            |                                     | C                                      | XC                                     |                            |
| • Auto Shutdown Controls -(P)               |                            |                                     | C (wells only)                         | XC                                     |                            |
| • Blowout Controls- (D)                     |                            |                                     | C                                      | XC                                     |                            |
| • Mud Program- (D)                          | X                          |                                     | XC                                     | XC                                     |                            |
| • Well Testing- (D)                         | X                          |                                     | XC                                     | XC                                     |                            |
| • Fencing & Gates- (P)                      | X**                        | X**                                 |  | XC                                     | X- C (PHV 100 ppm)         |
| Contingency Plan                            |                            |                                     | XC                                     | XC                                     |                            |
| Contingency Plan Activation Levels          |                            |                                     | X                                      | X                                      |                            |

D --- Drilling, Completion, Workover

P --- Production Facilities

X --- OCD Environmental Bureau Recommendations and Original H<sub>2</sub>S Work Group

C --- Commission's Present Draft

\*\*---- If located within ¼ mile of a public area