

OCD / OCC

Proposed Rule Comparisons

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

Case No. 12897 Exhibit No. 2

Submitted by OCD

Hearing Date 9/20/02

H ₂ S Threshold Chart	H ₂ S ≥ 100 ppm	H ₂ 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 H₂S Work Group

C --- Commission's Present Draft

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