OCD / OCC Proposed Rule Comparisons

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OIL CONSERVATION	COMMISSION
Santa Fe, New	Mexico

Case No. 12897 Exhibit No. 2

Submitted by OCO

Hearing Date 9/20/02

H ₂ S Threshold Chart	$H_2S \ge 100 \text{ ppm}$	$H_2S \ge 300$ ppm in	PHV 500 ppm ROE Includes	PHV 100 ppm ROE Includes	¹ / ₄ mile of Public Area
	100 ppin	Tanks	a Public Road	a Public Area	(**)
	-	Tanks	a rubiic Road	a Tubile Tuea	
Personnel Protection & Training	XC		XC	XC	
D&P					
Equipment Standards- (D&P)	X		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 	X		XC	XC	
Equipment-(D)					
• Wind Indicators- (D&P)	X		XC	XC	
• Signs- (D&P)	\$3.0		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	23.5	", ",	XC	X- C (PHV
5 ()		***************************************			100 ppm)
Contingency Plan			XC	XC	
Contingency Plan Activation Levels				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 1/4 mile of a public area