

Selected Inspection Workload Explanations

For production, drilling, and abandonment inspections (Petroleum Engineering Technician (PET))

Instruction Memorandum (IM) item 6. Cases that have had a change of Operator.

The Bureau of Land Management (BLM) encourages an inspection on cases for a new operator/case combination. The combination of the operator and case identifies the case as an inspection item. When a new operator acquires a case, the case becomes a new inspection item. If the operator is new to the area, or has demonstrated a problem with compliance on other cases, it is essential to perform an inspection, regardless of any previous inspection conducted on the former operator/case combination during the current fiscal year (FY).

For example:

- If an operator/case combination had a Production Inspection (PI) performed during the FY, and a new operator takes over, and is not new to the area and has been in compliance on other cases in the field office (FO), no additional inspection is necessary.
- In the case where the FO has not performed an inspection during the FY and the new operator takes over and is not new to the area, and has been in compliance on other cases in the FO, the new operator/case combination should use the old overall risk factor to determine if an inspection is required.
- In cases where the new operator is new to the area, an inspection is required to determine if there are any existing problems that the former operator did not correct, establish the compliance record for the new operator, familiarize a new operator with the inspector(s), and inform the new operator of any local requirements for that case.
- In cases where the new operator has demonstrated a problem with compliance on a majority of other cases in the FO, an inspection is required to ensure compliance with Federal requirements.

These requirements do not apply to name changes or mergers of an operator.

IM item 7. Inspections during any well production testing occurring during or after High Priority drilling operations but before changing the well status to a producing well status.

During or immediately after drilling operations, it is possible to test the well for production. During testing, production is occurring and not currently being accounted for by BLM personnel. A substantial amount of production may occur, and therefore it is essential to document and account for all production from the well. In accordance with the *Minerals Production Reporter Handbook* (MMS/MRM Release 1.0, dated 05/09/01), test production is required to be reported.

Inspections of production tests will be required during or after drilling operations to verify test production and ensure proper reporting of these volumes to the Office of Natural Resources Revenue. Document these inspections using the current drilling inspection form generated by Automated Fluid Minerals Support System (AFMSS), filed in hardcopy, and AFMSS.

Coding of these inspections in AFMSS will be as follows: Use the inspection activity of Production Test (PT) that is associated with the Drilling (DW) inspection type. **Do not** open a new DW inspection if a DW already exists for the well; instead add the PT activity to an existing DW inspection for the well. Only one DW inspection type per well should be recorded.

For surface compliance specialists

IM item 2. High Priority environmental inspections.

High priority environmental inspections apply if the well meets at least one of the following:

- A. The operations on a well are located in or adjacent to an area of special environmental sensitivity*, such as:
 - 1. Designated wilderness areas
 - 2. National Park Service and National Landscape Conservation System units
 - 3. Wilderness Study Areas
 - 4. Areas of Critical Environmental Concern
 - 5. Sensitive watersheds
 - 6. Visual Resource Management (VRM) Class I and II viewsheds
 - 7. Riparian areas
 - 8. Floodplains
 - 9. Wetlands
 - 10. Threatened and endangered species habitat
 - 11. Historic landmarks
 - 12. Areas of high erosion potential or low reclamation potential

*The prioritization could include but is not limited to these examples.

- B. The operations occur in other areas, which if conducted in noncompliance with lease stipulations or Conditions of Approval (COA) included in the operating plan, could have a substantial adverse impact on the environment.
- C. The well shows a history of surface and environmental noncompliance.
- D. Six months has passed after well completion or well abandonment (to ensure the operator properly completed earthwork for reclamation).
- E. The operator submitted a final abandonment notice (FAN).
 - 1. The BLM will approve final abandonment only after the location meets surface reclamation standards, required in the Surface Use Plan of Operations or Subsequent Report of Plugging and Abandonment, to the satisfaction of the BLM or the Forest Service (USFS) or other surface managing agency, if appropriate. Also, refer to *The Gold Book* Chapter 6 reclamation standards for recontouring, revegetation, and site stability.
 - 2. The BLM will consider the views of the split estate surface owner, if applicable,

when approving FANs. This consideration should be limited to the requirements in the approved Surface Use Plan of Operations or Subsequent Report to Plugging and Abandonment, and enforcement of Federal laws and regulations.

The USFS has the authority and responsibility under the regulations and the Federal Onshore Oil and Gas Leasing Reform Act of 1987 to ensure environmental inspections of National Forest System lands. The USFS will conduct environmental inspections (e.g., surface environmental concerns) on USFS lands. Therefore, offices may rate these wells as Low Priority for BLM inspection under the Environmental priority rating. Refer to the BLM/USFS Interagency Agreement or local BLM/USFS Memoranda of Understanding (MOU) for more specific guidance on roles and responsibilities.

The Bureau of Indian Affairs (BIA) must concur with the BLM's recommendations to release well sites from further reclamation responsibilities. Once the BLM notifies the BIA and recommends approval of the FAN, the BLM may rate the environmental priority as Low.

Criteria A and B listed above are very broad in nature and could be misinterpreted to indicate all wells should be rated High. This is not the intent. Discretion should be used to determine the potential for impact or noncompliance, along with the specific site conditions, production handling scenarios, and the past compliance history of ongoing activities occurring on the well before assigning the priority. For example, if the operator has successfully implemented mitigation for threatened and endangered (T&E) species or wetland conditions and the need to inspect the well on a High Priority basis does not exist, then the BLM should not rank the well as High Priority.

When offices establish new FY ratings, they should not assume that since the well was rated High under Environment the previous year, the same will hold true for the current year. Site conditions, operator compliance, or well activities may have changed and, therefore, warrant a different priority. AFMSS does not currently have the capability to track individual well priorities. Therefore, FOs should track their high priority wells using spreadsheets or other records.

IM item 3. Production/Interim Reclamation Inspections.

Upon completion of drilling operations, the operator must reclaim portions of the well location and access road no longer needed for active, long-term production and transportation operations. The BLM requires interim reclamation of these areas (e.g., recontoured, topsoil respread, proper color of facilities achieved, noxious weeds controlled, erosion controlled, and desirable vegetative community established) while the well is in production. Interim reclamation ensures protection of the environment during the life of the well and ensures topsoil will remain viable until the topsoil is reused for final reclamation. As a result of an audit by the Government Accountability Office (GAO), the BLM must document all interim reclamation inspections.

The AFMSS includes the Interim Reclamation inspection activity code (IR), which is associated with the Environmental Surface (ES) inspection type. Code to ES/IR when conducting interim

reclamation inspections and related compliance activities for well and facility locations and associated on lease roads and pipelines.

Conduct interim reclamation inspections to ensure compliance with the reclamation requirements outlined in the:

- i. Approved Application for Permit to Drill (APD) Surface Use Plan of Operations, including applicable APD Conditions of Approval;
- ii. Inspection items outlined on the Production and Interim Reclamation inspection form; and
- iii. Chapter 6 of *The Gold Book: Surface Operating Standards and Guidelines for Oil and Gas Exploration and Development*, current edition.

An environmental specialist trained in reclamation practices and monitoring, typically a Natural Resource Specialist (NRS), an Environmental Protection Specialist (EPS), or a Surface Compliance Technician, should perform interim reclamation inspections. To ensure proper reclamation practices, surface specialists should require operator notification prior to reclamation activities and witness a sampling of those activities. At a minimum, the initial inspection should occur within 6 months to 1 year after well completion to ensure the operator has completed the earthwork necessary for interim reclamation. If reseeding has not occurred at the time when the operator completes earthwork activities, a follow-up inspection must take place to ensure seeding had occurred during the first planting season. The BLM inspectors should conduct interim reclamation inspections periodically until the well, facility, or road location achieves successful interim reclamation.

When the operator has met the BLM's interim reclamation standards, additional IR inspections are generally no longer necessary unless the operator re-disturbs the reclaimed area during future drilling or workover operations. In general, the BLM considers interim reclamation of a site successful when the operator has:

- i. Recontoured all areas not needed for active, long-term production and transportation operations to the original landform, where possible, or created an interim landform that is stable, allowing sufficient flat area for the setup of a smaller workover rig and support equipment;
- ii. Spread 100 percent of the salvaged topsoil on the recontoured slopes in as close proximity to the well facilities and road surface as practical, allowing for active well operations (such as a teardrop access road for trucks hauling of fluids or inspecting the well);
- iii. Painted production facilities on location to blend with the natural, vegetated landscape;
- iv. Reasonably freed all disturbed sites of noxious weeds;
- v. Minimized surface runoff and erosion; and,
- vi. Successfully established the desired vegetative community on the majority of the well or facility location and the road cut and fill slopes.

The inspector not should record IR inspections for activities such as checking the integrity of dike berms around tank batteries, leaks, or spills on locations, screening of open containment tanks, or general housekeeping. The inspector should code these inspections to Surface

Producing (SP). However, if the inspection also includes a review of the interim reclamation aspects identified above, the inspector should use the IR inspection activity code for the entire inspection (coded as ES/IR only).