

# **Standards on the Proper Maintenance and Care for Field Compressors, Pumpjacks, and Containment of Fluids**

## **Background:**

This issue was initially raised by BLM representatives in 2004 as an area that needed improvement for protection of livestock, wildlife, surface water, and groundwater. Industry formed a small group that met with BLM representatives that year to discuss the issues of concern and attempted to reach consensus on proper maintenance and standards of care for field compression. More recently, BLM raised this same concern as well as the need to come to a consensus on restricting wildlife/livestock from collected fluids, so a working group was formed consisting of representatives from industry, Bureau of Land Management (BLM), New Mexico Oil Conservation District (NMOCD), and the United States Forest Service (USFS). The first meeting was held March 4, 2008 at the request of ConocoPhillips and subsequent meetings were held on Monday, May 12, 2008 and Tuesday, June 3, 2008.

## **Desired Standard of Care:**

The following areas of concern are the desired standard of care for field compression and day tank containment.

### Fluids Management:

- 1) Where possible fluids from compressor skids should drain directly to the pit tank. As an alternate, either the fluids on the skid shall be protected from wildlife / livestock access via appropriate screening, fencing, etc. or the accumulated fluids shall be pumped to a separate tank for proper storage and disposal;
- 2) Any open buckets or drip pans containing chemical, oil or an oil/water mixture and that need to remain on location will either be covered with an expanded metal cover or equivalent protection;

### Rags and Sorbent Media:

- 1) Rags or sorbent media are acceptable and can be used to contain, absorb, and recover spilled material. They shall be removed immediately after the spill is absorbed or recovered for proper offsite disposal;
- 2) Piles of rags or sorbent media left on the equipment are unacceptable and shall be removed from the location for proper offsite disposal;

### Leaks:

- 1) Leaks shall promptly be repaired and, to the extent possible, prevented from reoccurring;

- 2) Leaks that are not promptly repaired and/or result in spillage or release to the ground shall be reported to the well operator and, if regulatory limits are exceeded, to the appropriate regulatory agencies. The Authorized Officer may still issue written orders and/or incidents of Non-compliance (INCs) to initiate prompt correction.

#### Spill and Stain Cleanup of Compressor and Pumpjack Fluids:

- 1) Soils that have been impacted by incidental leaks and spills (i.e., less than 5 inches in depth as a guide) must either be managed by raking the impacted area and possibly applying an appropriate enhancement to promote bioremediation or by the taking the remediation steps determined by item 2 below. To further promote bioremediation and to prevent pooling of fluids upon impacted soils that could be accessible to wildlife and livestock, periodic re-raking, reapplication of soil amendments, or the addition of soils shall be implemented.
- 2) Management of soils that have been impacted more significantly than by incidental leaks and spills (i.e., greater than 5 inches in depth as a guide or greater than 5 barrels) must be discussed with the appropriate surface management agencies (BLM, NMOCD, USFS, etc.) to determine the appropriate remediation solution.

#### Day Tank Containment:

##### A. All lands under BLM jurisdiction

- 1) Day tanks containing lubricating oil, ethylene glycol or other chemical products shall be placed within proper containment. If that containment consists of a trough or similar device that is impervious, then the fluids shall be made inaccessible to livestock and wildlife by means of covering the opening with an expanded metal cover or equivalent protection.
- 2) Placement of day tanks within bermed areas is suitable in lieu of troughs or other impervious devices, but spills or leaks within or outside of the contained area must be promptly managed as described above.
- 3) The only exception to containment is for day tanks less than 30 gallons that are located on pump jack stands. In this circumstance no containment is required but access of livestock and wildlife to pooled fluids shall be restricted by appropriate means and any leakage or spillage shall be managed promptly as described above.

B. USFS, Carson National Forest, Jicarilla Ranger District,

- 1) Other than bulk storage tanks for crude oil and produced water; tanks, drums, etc. containing lubricating oil, ethylene glycol or other chemical products regardless of size must be provided with impervious containment and expanded metal or its equivalent to prevent access by both large and small wildlife.

Compressor/Engine Skid Cleaning:

- 1) Prior to beginning any pressurized cleaning, free standing oil and glycol will be soaked up with rags or absorbent media and removed from the skid for proper offsite disposal;
- 2) Once the skid is clear of any free liquids, pressurized cleaning can begin but should be done in a careful manner to avoid spraying any remaining oil and glycol onto the surrounding grounds.

Notification Requirements

- 1) Impacted soils near compressors and pumpjacks
  - a. Incidental impacted soils that require the use of manual hand tools (i.e., rakes, shovels, etc.) on location to promote bioremediation will not require a Sundry Notice submittal or prior approval from the Authorized Officer.
  - b. Impacted soils that will be excavated from the location by mechanized equipment for offsite disposal will require verbal notification to the Authorized Officer upon discovery of the contamination (followed by an electronic notification as soon as possible to mark\_kelly@nm.blm.gov) and a subsequent Sundry Notice or equivalent written notification (e.g., NMOCD final remediation report) upon completion of the remediation.
  - c. RCRA Exempt (non-hazardous) contaminated soils that will be excavated for on-lease landfarms will require a Sundry Notice submittal and prior approval by the Authorized Officer before soil disturbance can commence. Soils contaminated with RCRA non-exempt (hazardous) materials will not be allowed for on-lease landfarms.

The process of excavating soil from one well pad location and transporting the soil to another location for remediation is considered a “Small Land Farm” by OCD. Regulations pertaining to small land farms are contained in Title 19 Natural Resources and Wildlife, Chapter 15, Part 36, section 19.15.36.16. Requirements for obtaining an approved form C-137 EZ small land farm registration are contained in this regulation and must be obtained in addition to an approved Sundry Notice before exaction may be initiated.

## Termination Clause

BLM reserves the right to terminate this policy if repeated violations of procedures are not followed or it is determined that the intent of the policy is ineffective.