

## **PRODUCTION ACCOUNTABILITY DOCUMENTS**

When requesting documents from an operator in conjunction with production accountability inspections, the BLM needs to assure compliance with Onshore Oil and Gas Orders (OOGO) or approved variances. In order to better accomplish this, the operator is required to submit the following documentation for the previous 3 years or the period under review, whichever is the longer. (This list is not intended to be all inclusive.)

1. Gas analysis
2. Gas meter configuration reports
3. Gas volume statements
4. Event logs
5. Gas meter calibration reports
6. Orifice plate inspection records
7. Pumper/gauger reports
8. LACT proving reports
9. Run tickets
10. Strapping tables for oil tanks
11. Oil volume statements
12. Seal records
13. Self inspection records
14. Site Security Plan Note: Diagrams should be on file

An Incident of Noncompliance (INC) must be issued for each noncompliance; for example a gas meter that was not calibrated quarterly on two occasions over a 3-year period would result in two INCs. In that it is not possible to correct the historical record, other options should be considered. The following examples are not all inclusive:

1. Review of the same records for other cases looking for a systemic problem with the operator. If the problem is systemic, require the operator to submit for approval a plan to resolve the problem. A follow-up must be performed to verify the problem is resolved.
2. Require a 5-working day advance notification of the next event (gas analysis, meter calibration/proving, oil sale) so that the BLM can witness the event.
3. Require a new event (gas analysis, meter calibration/proving) be performed within 20 days and that a 5-working day advance notification be given so that the BLM can witness the event.
4. Meters - If the operator is unable to get a purchaser/transporter to perform and/or comply with OOGOs, then it may be necessary for the operator to install, maintain, and report volumes in the Oil and Gas Operations Report (OGOR)) using equipment installed in front of equipment installed by the purchaser/transporter.
5. Tank Gauge - If the operator is unable to get a purchaser/transporter to perform and/or comply with OOGOs, then it may be necessary for the operator independently gauge, seal, and report volumes in the OGOR.

Note: It is always the current operator's final responsibility to have and maintain historical records for 6 years, regardless of when the current operator became the operator.