

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
COLORADO STATE OFFICE
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LAKEWOOD, COLORADO 80215-7093
November 8, 2002

In Reply Refer To:
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EMS Transmission 11/08/2002
Instruction Memorandum No. CO-2003-005
Expires: 09/30/2004

To: Field Office Managers, Colorado

From: Acting Deputy State Director, Resource Services

Subject: Oil and Gas Inspection and Enforcement (I&E) Hydrogen Sulfide (H₂S) Protection Policy

Issue and Background:

Our most recent H₂S policy covering the I&E program was issued October 26, 1998, under COIM99-005. During statewide H₂S training it has been determined that safety equipment maintenance and procedure need to be updated to ensure the continued safety of our field going personnel. The policy provided for a means of escape if personnel came in contact with H₂S. Before and since then, all of our inspectors that could come in contact with H₂S are regularly trained and tested on the hazards of H₂S, the use of monitors, escape packs and calibration equipment. To address safety equipment maintenance and procedure updates, the policy was revised and sent as draft to the field for comment on July 29, 2002. No comments were received and the policy is being issued with minor editorial changes over the July 29, 2002, draft.

Policy:

As in the past, proper H₂S equipment consist of properly functioning monitor, escape pack and H₂S calibration bottle. The Colorado Bureau of Land Management (BLM) policy will continue to be that BLM personnel who inspect oilfield operations will escape and not continue to work in areas when their H₂S monitor is triggered. Specifically, in areas known to contain H₂S, or in areas that may contain H₂S, the personnel will carry an escape pack and monitor. If the monitor goes off at 10 Parts Per Million (PPM.), the escape pack is employed and the employee leaves the area. All personnel that could come in contact with H₂S are required to be trained by a certified H₂S instructor annually. Those who are not trained are only allowed to work in areas known not to contain H₂S. For the benefit of all field going personnel, attached is an Automated Fluid Minerals Support System (AFMSS) printout of areas that have been denoted in your database as containing either H₂S or a hazard.

After conferring with the field offices, it was determined that if an area is listed as hazardous in AFMSS, the reason is because H₂S is present, even though H₂S is not specifically recorded. As additional information becomes available, please update AFMSS and provide this office with changes so that new lists can be provided. In addition, the following reminders/policy will further enhance employee safety:

- It has been brought to our attention that H₂S calibration bottles can lose their potency after time even though the bottle may have sufficient pressure. Testing for impotent bottles can be done with the monitor.
- It has been determined that the sensors in our H₂S monitors are date stamped. Since Colorado's policy is to calibrate the monitor before every use in the field, we believe it is not necessary to replace the sensor if the date has been exceeded. If the monitor calibrates, then there is no need to replace the sensor. The sensor, monitor and/or calibration bottle should be replaced if the monitor does not calibrate.
- We would like to take this opportunity to remind you that both the escape pack and the monitor must be properly functioning and both be taken to the field when going to areas known to contain H₂S or in areas that may contain H₂S. Recent training has revealed that some folks were using the monitor and not the escape pack and not everyone was calibrating their monitor prior to use.
- Upon exposure to H₂S, physical exams will not be required unless a substantial exposure resulted in a person being rendered unconscious. Studies show that H₂S will extricate itself from the body over time.
- When inspecting in areas known to contain ~ or in areas that may contain H₂S, contact lenses are not to be worn.
- H₂S training will continue to be required yearly, either through the state H₂S instructor or an outside vendor. It will be the responsibility of each field office to arrange for this training.
- Areas that are known to contain H₂S are to be documented in AFMSS in the "Production Facility" screen (LEP.29). Put the determination date under the "H₂S Info Dt" window, the Parts Per Million (PPM) under the "H₂S" window and the storage tank vapor PPM in the "H₂S sty" window. In addition, areas known to contain H₂S are to be documented in the Agreement Maintenance Screen in AFMSS (GLB.63). Select "yes" under "Hazard?" and put "H₂S" in the "Remarks" section.
- In the past, the Colorado State Office has ordered needed equipment on behalf of the field offices. It will now be the responsibility of the field offices to budget for necessary equipment, properly equip field going personnel and assure maintenance of their equipment. The needed equipment can still be ordered through our state H₂S instructor.

This policy will be effective the date of issuance. If you have any questions, please call Pat Gallagher, State Oil and Gas I&E Coordinator, at (303)239-3756 or John Devore, State Safety Officer, at (303)239-3650.

Signed by
Jim May
Acting Deputy State
Director, Resource Services

Authenticated by
Don Snow
EMS Operator

Attachment