



# United States Department of the Interior

BUREAU OF LAND MANAGEMENT  
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Instruction Memorandum No. **BFO 2012 - 001**

To: Buffalo Field Office

APR 09 2012

From: Field Manager

Subject: **Clarification of Management of Oil and Gas Exploration and Production Pits (IM WY2012-007) for Coal Bed Natural Gas Development**

**Purpose:** This Buffalo Field Office (BFO) instruction memorandum clarifies the standards for the management of exploration and production pits associated with coalbed natural gas (CBNG) well activities. It applies to reserve, completion, emergency and workover pits. CBNG water impoundments are not addressed by this IM.

**Policy/Action:** On November 15, 2011, the Wyoming State Office (WSO) issued IM WY-2012-007, Management of Oil and Gas Exploration and Production Pits. In order to address CBNG development practices in BFO, a number of exceptions to IM WY-2012-007 were jointly developed by BFO and WSO. The specific exceptions to IM WY-2012-007 are outlined below:

2. Siting and construction of pits

- b.iii: Pit IM states "pits that will hold fluids must include a permanent marker designating the point at which 2 feet of freeboard remains in the pit." The requirement for the installation of a permanent marker is waived for CBNG pits in the BFO. However, pits must maintain 2 feet of freeboard.
- b.iv: Pit IM states "Pit walls must be sloped so that the stability of the pit wall is not compromised; generally pit walls will not exceed a 1:1 slope." In the BFO, CBNG and other shallow well pits are generally smaller than deeper conventional drilling pits and the sides are usually close to vertical. This is acceptable as long as the sidewall integrity is maintained, the pit is excavated entirely in cut material, and the pit is adequately fenced.
- b.v: Pit IM states "All pits shall be fenced on four sides upon construction, or as otherwise specified by the BLM." For BFO CBNG drilling, the pit may be fenced on three sides until the drilling rig moves off location, when the pit must be fenced on four sides.
- b.vii: Pit IM states "Re-entering a closed or reclaimed pit is prohibited unless the following protection measures are in place". At locations where previous drilling operations only disposed of fresh water and cuttings in the pit, it is permitted to re-enter a previously-closed CBNG pit with the following protective measures:
  - Remove and stockpile topsoil from area to be excavated, as well as from area where spoil/pit contents pile will be located,

- Disturbed pit contents are protected on-site by preventing wind or water erosion of excavated materials,
  - Replacing all the excavated pit contents upon cessation of operations. Respread topsoil, reclaim and revegetated the surface area.
- e.i: WY Pit IM states "All pits shall be lined (using a synthetic liner or clay liner) with the exception of flare pits, situations where only fresh water and nontoxic or nonhazardous muds and additives are being used for drilling, and pits for pneumatic (air) drilling." This exemption was intended to apply specifically to CBNG pits. If the pit will be situated in a sensitive area or if permeable subsurface material is encountered, a liner may be required by the BFO, even if the above exception criteria are met.
3. Management of pits during drilling and production operations
- e.i: WY Pit IM requires Sundry Notice approval for the reuse of drilling fluids at another drilling location due to the potential for contamination from non-RCRA exempt wastes or hazardous materials. Due to the lack of potential for contamination, Sundry Notice approval will not be required by the BFO for reuse of CBNG drilling fluids at another location, regardless of mineral estate, as long as the drilling fluids are comprised only of fresh water with entrained cuttings and/or coal fines.
4. Closure and reclamation of pits
- g.i: The WY Pit IM recommends requiring prior verbal or written notification for pit closure. Notification is not necessary for closure for BFO CBNG drilling pits.

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