

# Oil and Gas Spill Reporting

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## Notice to Lessees (NTL) – 3A

“Operators of onshore Federal and Indian oil and gas leases shall report all spills, discharges, or other undesirable events”

# Instruction Memorandum (IM) WY-2009-021

The Bureau of  
Land  
Management's  
(BLM's) policy on  
spill reporting  
procedures



# Spill Reporting

## Notice to Lessees (NTL) -3A

- Report any oil, salt water or any other toxic liquid spill to the appropriate BLM office's fluid minerals staff via undesirable event form and/or phone call
- The quicker we know about it, the quicker we can mitigate and remediate the issue
- A BLM employee will investigate the spill and determine further action
- If the appropriate field office is unknown, a location and/or well name and number or API number is needed

# Major vs. Minor Spills



VS



Major spills = more than 100 barrels (bbl) spilled or 500 thousand cubic feet (MCF) gas lost, or any spill occurring in a “sensitive area” (as determined by the BLM)

Other-Than-Major (aka Minor) spills = less than 100 bbl spilled or 500 MCF gas lost (or larger spills contained within secondary containment)

# Major Spills (NTL-3A)



## Major Spills (NTL-3A) (Cont.)

- Toxic liquid spills (condensate, produced water, etc.) which result in the discharge (spilling) of 100 **or more** bbl of liquid **not contained** by the facility firewall (berm, etc.)
- Equipment failures or other accidents which result in the venting of 500 MCF **or more** of gas
- Any fire which consumes the volumes of product as specified above

## Major Spills (NTL-3A) (Cont.)

- Any spill, venting or fire, regardless of the volume involved, which occurs in a sensitive area, e.g., areas such as parks, recreation sites, wildlife refuges, lakes, reservoirs, streams, wilderness study areas and urban or suburban areas
- Any spill which involves a fatal injury
- Every blowout (loss of control of any well)

These incidents occurring on BLM managed public lands must be reported to the appropriate field office as soon as practical but within a maximum of 24 hours and a written report must be submitted within 15 days.

# Other-Than-Major Spills (NTL-3A)



## Other-Than-Major Spills (NTL-3A) (Cont.)

- Toxic liquid spills (condensate, produced water, etc.), resulting in the discharge of **at least 10 bbl but less than 100 bbl** of toxic liquid in non-sensitive areas, and all discharges of 100 bbl or more when the spill is **entirely contained** by the facility firewall (berm)
- Equipment failures or other accidents resulting in the venting of **at least 50 but less than 500 MCF** of gas in non-sensitive areas

# Other-Than-Major Spills (NTL-3A) (Cont.)

- Any fire which consumes volumes in the ranges specified above
- Any spill involving a major or life threatening (but non-fatal) injury

These incidents occurring on BLM managed public lands do not have to be reported orally within 24 hours, however a written report must be submitted within a reasonable time.

## Other-Than-Major Spills (NTL-3A) (Cont.)

- Spills or discharges in non-sensitive areas involving **less than** 10 bbl of toxic liquid or 50 MCF of gas **do not** require an oral or written report; however, the volumes discharged or vented **must be** reported on the monthly report of operations and the monthly report of sales and royalty

# NTL-3A Reporting Requirements

Report	MAJOR	OTHER-THAN-MAJOR
Verbal	ASAP, no more than 24 hours	N/A
Written	Within 15 days of the event*	Within 15 days of the event

\*interim reports until final containment & cleanup, as appropriate

## Written Report Content

1. Date & time of occurrence, reporting to BLM and other agencies
2. Location, surface ownership, lease number
3. Nature and cause of event
4. Damages
5. Action, duration of control events & response
6. Volumes discharged, recovered, lost
7. If fatal injuries, cause of death
8. Preventative actions
9. Other requested information

**SPILL, LEAK,**

**Challenge 1:**

<b>Date Time of Report</b>	<b>Actual Date Time</b>
11/13/2007 2:10:00 PM	11/13/2007 8:00:00 AM
<b>Type of Facility</b>	<b>Lease or Well #</b>
Drilling Well	well:1692-42-1 lease
<b>Type of Fluid Lost</b>	<b>Total Leak/Spill</b>
Drilling mud	150gallons/~ 3.5 barrels
<b>Volume Recovered to Disposal</b>	<b>Volume Lost</b>
150gallons/~ 3.5 barrels	0
<b>Affected Area</b>	
See Attached	
<b>Use of Spill Area</b>	
Oil & Gas, Grazing	
<b>Surface Owner</b>	
BLM(Weber Ranch)	
<b>Surface Material</b>	<b>Surface Condition</b>
silt loam	Dry
<b>If Yes, Explain</b>	
Dry intermittent drainage- no longer in threat due to	
<b>Describe cause of discharge and actions</b>	
Uncontaminated drilling fluid released from premix mud was accidentally released outside of the pit onto	
<b>Describe remedial measures and how successful</b>	
Fluid release was stopped, all drilling mud was collected and disposed of in permitted reserve pit.	
<b>Supervisor Notified By</b>	<b>Date/Time Supervisor Notified</b>
KennyCruth	11/13/07
<b>Required Person Notifying the State Agency</b>	
<input checked="" type="checkbox"/>	Tucker Smith
<b>Name of State/Federal Representative/Agency</b>	
BLM - Travis Bargston	
<b>Direction from Nearest Town</b>	
~26 miles north of Baggs, WY - Carbon County	
<b>Remarks</b>	
<b>Est. Cleanup Cost</b>	<b>Person Preparing Report</b>
\$1,600.00	Tucker Smith



United States  
Bureau of Land Management  
**Report**

- Operator: Double Eagle Petroleum
- IID NO (Unit/PA, Lease, CA, R/W): Well: 1692-42-1
- Date and Time of Occurrence: 11-12-2007 8:00
- Date and Time Reported to BLM: 11-13-2007 3
- Reported By: Tucker Smith
- Person in Charge: Steve Degenfelder
- Location: County Carbon
- Surface Ownership (Federal, Fee, Indian, State)
- Well or Facility ID: Well: 1692-42-1
- Type of Event (see instructions): Class III
- Cause of, and Extent of Event:  
Fluid released from premix tank. Drilling mud was accidentally released outside of the pit onto the
- Volume Discharged or Consumed: Oil  
Volume Recovered: Oil  
Volume Lost: Oil
- Time Required to Control Event:
- Action Taken to Control Event:  
Fluid release was stopped, all drilling mud was be disposed of at a federally regulated disposal
- Description of Resultant Damage/Injuries:  
ALL affected soil collected and removed from
- Clean up procedures and dates:  
Fluid release was stopped, all drilling mud was be disposed of at a federally regulated disposal
- General Remarks:  
Post incident investigation revealed contractor
- Other Federal, State, and Local Agencies Notified:  
Response Center (800-424-8802), DOI OEPC (303) BLM Rawlins, Travis Bargston
- Signature: *Tucker Smith*

.....  
BLM USE ONLY

A. Division/Field Office:	
C. Event Classification (I, II, or III):	
D. Site Inspected By:	
E. FY (PRIORITY YEAR):	
F. INSPECTION TYPE: NU	
H. NO. TRIPS:	INSPECTION HRS:

Submit by Email

Print Form



WYOMING BUREAU OF LAND MANAGEMENT  
Oil & Gas-Related Spill  
Notification/Discovery Form



<b>BLM Field Office:</b>		<b>BLM Employee:</b>	
<b>Reported By:</b>		<b>Telephone #:</b>	
<b>Operator:</b>			
<b>Date/Time of Occurrence:</b>		<b>Date/Time BLM Notified:</b>	
<b>Well/Facility Name, #:</b>		<b>Lease Number:</b>	
<b>State: WY</b>	<b>County:</b>	<b>Twn:</b>	<b>Rng:</b>
		<b>Sec:</b>	<b>Qtr:</b>
<b>Surface Ownership:</b> <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> State <input type="checkbox"/> Fee			
<b>Type(s) of Event:</b>		<b>Other (Describe):</b>	
<input type="checkbox"/> Oil/Condensate Spill			
<input type="checkbox"/> Produced Water Spill			
<b>Nature and Cause of Event:</b>			
<b>Environmental Impact:</b>			
<input type="checkbox"/> Entered or threatens surface water			
<b>Volumes Discharged or Consumed:</b>		<b>Units:</b> <input type="checkbox"/> BBLs <input type="checkbox"/> GAL <input type="checkbox"/> MCF <input type="checkbox"/> _____	
<b>Volumes Recovered:</b>		<b>Net Volume Lost:</b>	
<b>Actions Taken to Control Event:</b>			
<b>Resultant Damage:</b>			
<b>Clean-Up Procedures and Actions Taken to Prevent Recurrence:</b>			
<b>Cause/Extent of Personal Injury, if Applicable:</b>			
<b>Agency Notifications:</b>	<b>Agency Notified?</b>	<b>Contact Name</b>	<b>Date/Time</b>
	WDEQ <input type="checkbox"/>		
	WOGCC <input type="checkbox"/>		
<b>Remarks:</b>			
<input type="checkbox"/> NRC <input type="checkbox"/>			

# Other Reporting and Response Requirements

- There are multiple and complex requirements for reporting and response to hazardous materials releases
- Reporting to BLM under NTL-3A does not relieve the operator from responsibilities of reporting under other regulations or statutes (i.e., Comprehensive Environmental Response, Compensation and Liability Act, Emergency Planning and Community Right-To-Know Act, etc.)

# Determination of Loss

## 1. **Avoidable** – royalties are due

- If considered a *waste of oil or gas*, 43 CFR §3160.0-5
- “An operator shall be liable for royalty payments on oil or gas lost or wasted from a lease site, or allocated to a lease site, when such loss or waste is due to negligence on the part of the operator...”, 43 CFR §3162.7-1(d)

## 2. **Unavoidable** – royalties are not due

# Illegal Activity Spills

- If spill resulted from illegal activities, immediately contact the appropriate BLM Law Enforcement Officer (LEO) or ranger
- The LEO will lead the investigation with support from other law enforcement personnel and the fluids minerals staff

# Lease/Unit Operator is Not Responsible

- Typically involves an on-lease spill by an entity with legal access across the lease or unit



# Soil Testing

- If product is spilled off a pad or containment area, a soil sample test will likely be required
- Generally, total petroleum hydrocarbons (TPH) above 10,000 parts per million (PPM)(or mg per kg) will require remediation of the contaminated soil
- Where feasible and practical, onsite bioremediation of contaminated soil is preferable to offsite treatment and/or disposal

# Failure to Notify

- Failure to provide the necessary notification, reports or contingency plan (when required) may result in other measures being taken to secure compliance (including enforcement actions under 43 CFR §3163, such as an Incident of Noncompliance)

# Rock Springs Field Office

## Natural Resource Specialists (NRS)

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### Front Desk

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# Questions



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