

From: fracdallas@fracturing.org
To: Oil and Gas Conservation Bureau@idaho.gov
Cc: fracturing@idaho.gov; Tom Shure
Subject: IDL regarding Proposed Rules for Oil and Gas Conservation, Docket No. 20-0702-1601
Date: Wednesday, October 26, 2016 01:58:37 PM

Dear Mr. Wilson,

This e-mail pertains to Section 430 - Gas Processing Facilities, as follows:

430. GAS PROCESSING FACILITIES.

Gas processing facilities must meet the following requirements.

(4-11-15)

01. Location of Gas Processing Facilities. No gas processing facility may be constructed within three hundred (300) feet of existing occupied structures, water wells, canals and ditches, the natural or ordinary high water mark of surface waters, or within fifty (50) feet of highways, as measured from the outermost portion of the gas processing facility. ~~The owner of a water well or existing occupied structure may provide express written permission to construct a gas processing facility closer than three hundred (300) feet, but in no event may a gas processing facility be constructed within one hundred (100) feet of a water well or existing occupied structure.~~ The following exceptions may apply:

a. ~~The owner of a water well or existing occupied structure may provide express written permission to construct a gas processing facility closer than three hundred (300) feet, but in no event may a gas processing facility be constructed within one hundred (100) feet of these features.~~ ()

b. The owner of a canal, ditch, or surface water may provide express written permission to construct a gas processing facility closer than three hundred (300) feet, and the Department may approve this location upon the operator showing good cause, but in no event may a gas processing facility be constructed within one hundred (100) feet of these features. ()

02. Operations. Operators of gas processing facilities must notify the Department which wells, by API number, are served by a gas processing facility. All gas processing facilities not constructed on a well site must comply with the requirements in Sections 301 and 302 of these rules. (4-11-15)

03. Meters and Facility Plans. Gas processing facilities must account for all liquids and gas entering and leaving the facility with accurate meters. A supervisory control and data acquisition systems or other data recording system must be used to monitor the liquids and gas in the facility. Operators of gas processing facilities must submit an as-built facility design plan to the Department upon completion of the facility, a facility design plan must contain at the minimum: (4-11-15)

a. Site layout: (4-11-15)

b. Piping and instrumentation diagram: (4-11-15)

c. Process Flow schematics: (4-11-15)

d. Electronic controls and sensing schematic: (4-11-15)

e. ~~Equipment operations and maintenance manuals for pumps, meters, heat exchangers and any other operationally critical equipment that requires periodic maintenance and calibration.~~

f. ~~Periodic maintenance schedule for critical equipment.~~

g. ~~Troubleshooting metric and~~

h. ~~Other information or documentation necessary for the safe and continued operation of a gas processing facility.~~

04. Operational Details. The operator must also provide the Department access to the following documentation upon request: ()

a. ~~Equipment operations and maintenance manuals for pumps, meters, heat exchangers and any other operationally critical equipment that requires periodic maintenance and calibration.~~ ()

b. ~~Periodic maintenance schedule for critical equipment; and~~ ()

c. ~~Troubleshooting metric.~~ ()

045. Flaring. Flaring at gas processing facilities must be in conformance with IDAPA 58.01.01, Rules for the Control of Air Pollution in Idaho, and any permit issued by the IDEQ. (4-11-15)

046. Inspections. Gas processing facilities must have site specific facility design plans and a log book of gas metered in and out of the facility available for review by Department staff during the inspections of gas processing facilities. During inspections, gas processing facility staff must demonstrate knowledge of all operations and the location of all emergency shut off equipment, direction of flow lines, and heat exchangers. ~~The Department will conduct quarterly inspections of facilities.~~ (4-11-15)

047. Reports. A quarterly report must be submitted to the Department accounting for receipt, processing, and disposition of all gas by the gas processing facility within the reporting period. The report is due to the Department ~~by the twenty-first (21st) ninety~~ (90) days following the end of the reporting period. (4-11-15)

The proposed setback distances from occupied structures, highways and other critical infrastructure is far too inadequate to provide adequate protection for people and property in the event of an explosion, fire or vapor release of toxic, neurotoxic and/or carcinogenic fugitive emissions or intentional releases of such harmful substances that adversely impact the health of humans and animals. A recommended safe setback distance for a gas processing facility should be AT LEAST one mile from any occupied structure or critical infrastructure.

The proposed setback distances from canals and other waterways is far too inadequate to properly protect the surface water that is critical for agricultural production. The potential for contamination from an explosion at a gas processing facility demands a safe setback distance. A recommended safe setback distance for a gas processing facility should be AT LEAST one mile from any occupied structure or critical infrastructure.

The proposed rule eliminates a requirement for IDL monthly inspections of gas processing facilities. This is unacceptable. It is the responsibility and duty of IDL to insure that the public is safe from harm caused by operators and operations permitted by IDL and operating under IDL rules. Failing to properly inspect gas processing facilities to ascertain that equipment and systems are in proper working order and that personnel are properly trained and equipped to handle emergencies could result in civil and/or criminal liability for IDL, as well as its administrators and agents. At the very least, gas processing facilities should be inspected on a quarterly basis, though a monthly basis would be safer and more responsible considering the potential for explosions, fires and harmful vapor releases.

Links to supporting documentation regarding gas processing facilities explosions and fires in the US:

- <http://fuelix.com/blog/2016/06/28/explosions-fire-hit-mississippi-natural-gas-plant-owned-by-houston-firm/>
- <http://www.gasprocessingnews.com/news/wyoming-gas-processing-facility-shut-down-after-explosion-fire.aspx>
- http://www.nola.com/traffic/index.ssf/2016/06/pascagoula_gas_plant_explosion.html
- <http://www.cpeexploration.com/news/Ramsey-Natural-Gas-Processing-Plant-suffers-an-explosion-1>
- <http://www.slatter911.com/2015/12/04/must-see-video-texas-natural-gas-processing-plant-explosion/>
- <https://www.youtube.com/watch?v=jRp71MkDBAI>
- <https://www.theguardian.com/world/2014/apr/01/live-injured-natural-gas-plant-explosion-washington>

Please make sure this e-mailed information is included in the official record of public documents submitted to IDL regarding Proposed Rules for Oil and Gas Conservation, Docket No. 20-0702-1601, as required by federal and state laws.

Most sincerely,

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"We only have one environment. When we destroy it we will become as extinct as the dinosaurs!"