

# Memorandum

**Date:** August 31, 2015  
**To:** Timothy Stapleton  
Luis Perez  
**From:** Dean Dusette  
**Subject:** July 6, 2015 Gary Gless VOC Correspondence

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## Background

In an email dated July 23, 2015, Mr. Gless requested Volatile Organic Compound (VOC) monitoring data for the time period 0900 to 1100 on July 6, 2015 from a re-work/maintenance rig located near the FM O&G offices. At the July 23, 2015 CAP meeting Mr. Gless commented that air monitoring equipment (PID) operating along the FM O&G fence line detected VOC readings as high as 1,744 ppm with an average reading of 1,115 ppm. Mr. Gless also noted that he forwarded a noise complaint (banging of pipe) from the same operation to FM O&G on the afternoon of July 1, 2015.

Mr. Gless did not provide any detail on the location of the air monitoring equipment, the air monitoring protocol or program being conducted along the FM O&G fence line, or on the air monitoring equipment itself (make, model, detection range or calibration data). Further, it should be noted that no complaint regarding the VOC readings was forwarded to SCAQMD or the FM O&G complaint number at the time.

## Follow-up

A site inspection and interview with FM O&G staff was completed on August 5, 2015 regarding the subject correspondence. The subject well identification is MB-307. The Oilwell Rig was performing a standard submersible pump change along with a partial change out of the tubing and rods. The job did not require the use of the air monitoring trailers (H<sub>2</sub>S and THC) pursuant to CSD requirements. The project did have air monitoring equipment on the rig floor (RKI 4-way monitor for LEL, O<sub>2</sub>, H<sub>2</sub>S, CO) for employee safety; there were no monitor alarms during the entire job.

Wind speed and wind direction data for the time period 0900 to 1100 on July 6, 2015 was obtained from the FM O&G onsite meteorological station:

FM O&G Meteorological Data July 6, 2015 Hourly Average		
Time Period	Wind Speed (mph)	Wind Direction
0800	6.1	257
0900	7.6	244
1000	9.3	245
1100	10.8	219

The location of Well MB-307 with the approximate wind direction (green arrow) attached. The wind direction indicates the potential for transport of odors from the oil field to the area east and north east of Well MB-307. It should be noted that the relatively high wind speeds for early morning, average 8.5 mph, would also indicate good dispersion or mixing of the air.

As a final check on Well MB-307, MRS and FM O&G staff inspected the well and surrounding area with a hand held THC analyzer (Instrument: GMI GT-44, Range 0 to 2,000 ppm THC, Calibration Date 5/20/15). No elevated readings were detected.

#### CSD Air Monitoring Requirement

Air monitoring for hydrogen sulfide (H<sub>2</sub>S) and total hydrocarbon (THC) vapors is required for all drilling, re-drilling and reworking operations pursuant to CSD Provision E.2.d. CSD definitions for the three operations as follows:

***Drilling.*** "Drilling" shall mean digging or boring into the earth for the purpose of exploring for, developing, or producing oil, Gas, or other hydrocarbons, or for the purpose of injecting water, steam or any other fluid or substance into the earth.

***Redrilling.*** "Redrilling" means any Drilling operation, conducted to recomplete an existing Well in the same or different zone, but does not include Reworking operations as defined in this Section.

***Reworking.*** "Reworking" shall mean recompletion of an existing well within its existing well bore, to include operations such as liner replacements, perforating, acidizing or fracing, but does not include deepening of the well, beyond its originally permitted depth.



Wind Direction

Well MB-307

W 57th St

