

MEMORANDUM OF UNDERSTANDING
BETWEEN THE
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
AND THE
DEPARTMENT OF CONSERVATION
DIVISION OF OIL AND GAS
DISTRICT 1 (LONG BEACH) and DISTRICT 2 (SANTA PAULA)

Purpose

The purpose of this Memorandum of Understanding (MOU) is to outline the areas of responsibility between the South Coast Air Quality Management District (SCAQMD) and the Department of Conservation, Division of Oil and Gas (Division) for the inspection of oilfield valves and flanges that fall under the provisions of SCAQMD Rule 466.1. Implementation of this MOU will provide a coordinated approach to satisfying the statutory obligations of both agencies. These procedures will ensure that valves and flanges on oil, gas, and injection wells and related production equipment will not cause an excessive amount of degradation of air quality within the jurisdiction of the respective districts. The attached maps show district boundaries and office addresses.

General

Responsibilities

The Division has the statutory responsibility to prevent, as far as possible, environmental degradation and loss of oil or gas resulting from the drilling, operation, maintenance, or abandonment of oil and gas wells. (Public Resources Code Section 3106).

SCAQMD has statutory responsibility to protect the air quality of its district.

Scope of Agreement

The following procedures have been formulated and adopted by the Division and SCAQMD to: (1) simplify reporting of leaks emanating from valves and flanges, (2) achieve coordination of activity, and (3) eliminate duplication of effort between the Division and the SCAQMD.

Procedures

1. The Division will inspect valves and flanges for oil and gas leaks within urban drill sites that are continuously monitored by inplace gas detectors. Valves and flanges at urban drill sites that are not continuously monitored by inplace gas detectors will be inspected by the SCAQMD.

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2. The Division will inspect all valves and flanges for liquid leaks from the wellhead to the first point of separation of produced fluids for all exempt and nonexempt wells. SCAQMD will perform inspections for liquid leaks from the first point of separation of produced fluids to the product shipping line for all nonexempt wells. The SCAQMD will also inspect valves and flanges for gas emissions for all wells that are not exempt from the gas regulations of Rule 466.1.
3. The Division will provide SCAQMD with a list of nonexempt wells annually on May 1. Yearly production averages will be used to formulate the data.
4. SCAQMD will supply the Division with copies of any approved exemptions to an operator's gas system under Rule 466.1.
5. The Division will inform SCAQMD of any violations under Rule 466.1 observed while carrying out the provisions of this MOU. Also, the Division will provide the SCAQMD with a quarterly report of inspections and violations.
6. SCAQMD concurs with established Division environmental inspection procedures and timetables.
7. Representatives from Division Districts 1 and 2 and SCAQMD will be designated as contact persons to coordinate the provisions of this MOU.

Enforcement Coordination

Enforcement actions involving both statutory authorities should be coordinated among the parties involved in this MOU, but neither agency is precluded from taking independent enforcement action.

Modification or Termination of this Agreement

This agreement will be effective upon signature by the designated parties. The agreement may be modified upon the initiative of either party for the purpose of ensuring consistency with State or Federal statutes or regulations, or for any other purposes mutually agreed upon. Any such modifications must be in writing and must be signed by the State Oil and Gas Supervisor and the Director of Enforcement of the South Coast Air Quality Management District.

This agreement may be terminated by either party upon 60-day, prior written notification of the other party. It may also be terminated at any time by mutual consent of both parties.

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Memorandum of Understanding Between the South Coast Air Quality Management District and the Department of Conservation, Division of Oil and Gas, Districts 1 and 2.

[Signature]
State Oil and Gas Supervisor

[Signature]
Executive Officer
South Coast Air Quality
Management District

3-14-1985
Date

9/3/85
Date

CONCUR: *[Signature]*
Director
Department of Conservation

APPROVED AS TO FORM
[Signature]
CURTIS L. COLEMAN DATE 9-3-85
DISTRICT COUNSEL, SCAQMD

Date: 3/14/85