

**STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
SUPERVISOR OF WELLS INSTRUCTION 1-2009**

**IDENTIFICATION OF COMPANY PERSONNEL – PARTS I AND II CONTINGENCY PLAN**

**Purpose**

The purpose of this Supervisor of Wells Instruction is to clarify filing requirements of Rule 1110 of Part 615, Supervisor of Wells, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA), by establishing the minimum acceptable information required for oil and gas operators in identifying company personnel pursuant to this rule.

**Applicable Statutes and Rules**

Part 615, Supervisor of Wells, of the Natural Resources and Environmental Protection Act, 1994, PA 451, as amended (NREPA).

Rule 1110 Contingency Plans of Part 615 for drilling and production.

**Background**

Part 615 requires an operator who intends to drill a well that may encounter hydrogen sulfide (H<sub>2</sub>S) to file a contingency plan. The contingency plan consists of two parts: Part I contains the general procedures that the operator will take following the event of an emergency involving the possible release of H<sub>2</sub>S, and Part II contains site-specific information for a specific well that may encounter H<sub>2</sub>S. Rule 1110(2)(a) requires the permittee to keep Part I of the plan up to date with a list of personnel to be contacted and their duties and responsibilities. The list shall also include a delegation of duties and responsibilities and specify who is responsible for ordering ignition of the H<sub>2</sub>S well if necessary. Rule 1110(3)(c)(i) requires the permittee to include in Part II of the contingency plan, a list of the names, telephone numbers, and addresses of representatives of the permittee.

Based on previous experiences during the drilling of H<sub>2</sub>S wells, the Supervisor believes that the company representative responsible for drilling operations and well control should not also be the individual responsible for notifying county emergency management personnel or members of the public.

**Instruction**

The minimum information acceptable to the Supervisor of Wells in satisfying the requirements of Rule 1110(2)(a) and Rule 1110(3)(c)(i) with regards to the drilling of a potential H<sub>2</sub>S well is as follows:

The name and contact information for the local representative of the permittee with overall authority for drilling operations and well control including the ordering of ignition of the H<sub>2</sub>S well if necessary, and the name and contact information for the local representative of the permittee with responsibility for notifying county emergency management personnel and/or members of the public.

One individual may not perform both functions.

THIS INSTRUCTION IS EFFECTIVE May 22, 2009.

This Instruction replaces Instruction 1-2009 dated April 14, 2009.

Date: *May 7, 2009*



HAROLD R. FITCH  
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