

**BP Comments to Meeting 3**  
*Minutes*  
*September 14, 2005*

1. Provide comments on pros/cons of requiring the installation of continuous H<sub>2</sub>S monitors on the gas gathering systems.

Cons: Very expensive for installation and maintenance, could get a false sense of security if not properly maintained, manpower commitment:

Pros: Know H<sub>2</sub>S content of gas leaving system if properly maintained

2. Provide comments on the need for and the frequency of mandatory reporting of H<sub>2</sub>S concentrations from producers.

BP has been successful with a program that tests each well every 7 years and if a well tests positive for H<sub>2</sub>S then it is placed on a once a year monitoring program and treated with chemical, if necessary. BP does not see the need for a mandatory report as we handle this internally

3. Provide comments on whether or not the Corporation Commission should formally set the level for the maximum amount of H<sub>2</sub>S in gas provided to consumers.

In order to achieve consistency throughout the Hugoton field, BP believes that the KCC should provide some maximum level amount of H<sub>2</sub>S that can be provided to consumers (particularly homeowners) while considering such standards as the 10 ppm maximum set (or some fraction thereof) by OSHA (Occupational Safety and Health Administration) and ACGH (American Conference of Governmental Hygienists).

4. Provide comments on what safety factor controls the safety threshold: internal corrosion or concentration in ambient air.

See answer # 3

5. Provide comments on the necessity of developing a database of internal corrosion failures to track the affects of H<sub>2</sub>S on the integrity of the gathering system.

Corrosion is typically not caused by H<sub>2</sub>S on our systems since our gas is relatively sweet in terms of corrosion. Thus BP does not support the development of a database of internal corrosion failures.

6. Gas providers to take steps to educate first responders and emergency management on the dangers of H<sub>2</sub>S; possibly use Kansas One Call meetings to achieve this goal.

BP would be willing to educate first responders and emergency management on

the dangers of H<sub>2</sub>S

7. Provide comments on what other groups that should be made aware of H<sub>2</sub>S.

Homeowners, irrigators, commercial users or any end user of gas from a gathering system where gas is suspected of exceeding OSHA's 10 ppm limit.

8. KCC Staff to request providers of unprocessed natural gas to notify end-use consumers of the potential dangers of H<sub>2</sub>S by December, 2005.

This can be done if requested by KCC but a December 2005 deadline is questionable due to holidays and year end activities.

9. Provide comments on whether or not electronic versions of gas gathering maps should be available to the public.

BP is against public access to electronic maps due to safety and security reasons

10. Provide comments on a proposed requirement that all wells be sampled for H<sub>2</sub>S at least annually and the results reported to KCC.

See # 2 answer. Additionally, there would be incremental costs associated with testing each well annually that is unwarranted.

11. Provide comments on the need for regulations to mandate action similar to that contained in RP 55 should H<sub>2</sub>S contamination reach 100 ppm.

The only reference to H<sub>2</sub>S at 100 ppm is paralysis of the olfactory nerve (loss of the sense of smell). Mandated actions at this level were not found. However, many references to 10 ppm are mentioned with suggestions for protection at such levels.

12. Provide comments on the impact of sampling for H<sub>2</sub>S contamination and the impact complying with RP55 would have on small producers.

BP is not a small producer