



COGCC FORM INSTRUCTIONS

FORM #2A

ODOR MITIGATION PLAN

Document Control:

Created Date:	August 18, 2021
Document Owner:	OGLA Group

Rule Citation

Rule 304.c.(4). **Odor Mitigation Plan.** An odor mitigation plan consistent with the requirements of Rule 426.a.

426. ODORS

- a. For proposed Working Pad Surfaces within 2,000 feet of a Building Unit or Designated Outside Activity Area, Operators will submit an odor mitigation plan as an attachment to their Form 2As, as required by Rule 304.c.(4). An Operator may submit substantially equivalent information or plans developed through a Local Government land use process or federal process in lieu of the information required by this Rule 426.a unless the Director or Commission determines that the information or plan developed through the Local Government land use process or federal process is not equivalent. All odor mitigation plans will address:
 1. How the Operator will comply with all requirements of this Rule 426 through one or more proposed methods; and
 2. All Best Management Practices the Operator will use to reduce odors.
- b. Operators will conduct all Oil and Gas Operations at all Oil and Gas Facilities in a manner that minimizes odors outside the boundaries of the Oil and Gas Location.
- c. In areas within 2,000 feet of a Building Unit or Designated Outside Activity Area, Operators will use current and appropriate Best Management Practices to minimize odors.

Purpose of Attachment

The Odor Mitigation Plan should identify the potential sources of odors associated with all phases of oil and gas operations at a proposed location, describe the measures and controls that are planned to eliminate or minimize odors, and include all Best Management Practices (BMPs) for addressing odors. The Odor Mitigation Plan is to

ODOR MITIGATION PLAN GUIDANCE

cover anticipated sources of odors, including, but not limited to, drilling fluids and cuttings, flowback and produced fluids, and exploration and production waste. One or more methods of maintaining compliance with Rule 426 will be discussed in the Odor Mitigation Plan.

An Odor Mitigation Plan, or substantially equivalent information and plans developed through a local government land use process, will be submitted for proposed Locations with Working Pad Surfaces within 2,000 feet of a Building Unit or Designated Outside Activity Area.

Requirements List

The following list primarily addresses drilling operations, note that the Odor Mitigation Plan must address all operations (including drilling, completions, flowback, production, and E&P waste management):

1. A list of all potential sources of odors at the location, examples include; drilling mud, shale shakers, cuttings staging and transfer areas, truck loading of cuttings, and drilling mud on pulled drilling rods.
2. Identification of the drilling fluid planned for the location.
3. Oil based drilling fluids will include a description that includes the IPIECA/OGP (International Petroleum Industry Environmental Conservation Association/International Association of Oil & Gas Producers) classification (Group), if applicable, and the aromatic content (by percentage) of the drilling fluid, if it is not possible to classify the drilling fluid by Group.
4. A list of odor reducing or suppressive additives that are planned for use on the location, as part of normal operations.
5. A description of equipment and processes used to control odors for each odor source or activity on the location. These can be clustered into groups or phases.
6. A description of how cuttings will be managed at the location to include how odors will be managed during the transport away from location.
7. A list of all odor control BMPs that apply to the location. This list is to be provided in a format that allows the BMPs to be copied onto the Form 2A.

General Notes

The Commission or Director may require an operator to evaluate its operations and impose additional mitigation measures in the event of a complaint, an inspection, or other observation of odors.

ODOR MITIGATION PLAN GUIDANCE

The Odor Mitigation Plan is required for Locations with a Working Pad Surface within 2,000 feet of a Building Unit or Designated Outside Activity Area. If a plan is not required, the operator may still add Best Management Practices to the Form 2A to address odors as appropriate.

When the Odor Mitigation Plan is not required for a Location, add a comment to the Form 2A's submittal box. In this case, do not request a Lesser Impact Area Exemption from the Odor Mitigation Plan.