FREQUENTLY ASKED QUESTIONS
Environmental Protection Performance
Standards at Oil and Gas Well Sites
Use of safety devices – blow-out prevention equipment
(§ 78a.72)

The purpose of this Frequently Asked Questions (FAQ) document is to highlight changes in and address questions about the new regulations. This FAQ should not be used in lieu of reference to the 2012 Oil and Gas Act, 25 Pa. Code Chapter 78a and other applicable laws and regulations. The answers outlined in this FAQ are intended to supplement existing requirements. Nothing in this document shall affect statutory or regulatory requirements.

This document is not an adjudication or a regulation. There is no intent on the part of the Department to give this document that weight or deference. The Department may supplement or amend this document at any time as necessary without notice.

Question:

API Recommended Practice 53 establishes BOP testing protocols that differ from those in the Department's regulatory requirements under Chapter 78 (relating to oil and gas wells) and Chapter 78a (relating to unconventional wells). Some operators have expressed concern that more frequent function testing will cause excessive equipment wear. What is the Department's current interpretation of how API Recommended Practice 53 and the regulations under 78a/78.72(e) and 78a/78.72(f) interface?

Response:

Sections 78.72 and 78a.72 distinguish between two different BOP testing protocols:

(1)   *Initial Function and Pressure Testing)* – those protocols to be used prior to operations, i.e., before placing the BOP in service, as described in subsection (e) of each section; and

(2)   *Subsequent Function and Pressure Testing* – those protocols to be used after operations requiring a BOP have commenced, as described in subsection (f) of each section.

For *Subsequent Function and Pressure Testing*, the Department's testing program for rams specifies a greater number of assessments than API's in terms of testing frequency.

In light of recent updates to API Recommended Practice 53 and operational considerations/industry best management practices, the Department will accept both frequency and function testing as compliant, if they align with all recommended practices in API Recommended Practice 53. For operators choosing to utilize another method after the BOP is placed in service and not described in this FAQ, the procedure should be documented on forms provided by the Department and submitted for review and approval by the Department prior to implementation. *See 8000-FM-OOGM0017*.