

Clarification of Specific Codes

RA - Records Analysis: An in-office detailed review of all production records associated with a case (including but not limited to Oil and Gas Operations Report (OGOR), run tickets, gas charts, integration statements, calibration/proving reports, volumes calculations, flaring/venting approval, etc.) for a given reporting period. Other records the field office (FO) may review include but are not limited to State or other third-party records (e.g., purchaser and/or transporter records).

Since the RA inspection type requires a review of all records, FOs can use the Production Records Review (PR) activity code to capture all of the work completed. Some offices, however, prefer to track the activities with more specificity. Therefore, FOs can use numerous activity codes to track the work if preferred, but it is not required. The definition of the PR activity code is as follows:

PR - Production Records Review: An office review of all production records (operator, or third party, such as purchaser or transporter, etc.) associated with a case (including but not limited to OGORs, run tickets, gas charts, integration statements, calibration/proving reports, volumes calculations, flaring/venting approvals, etc.) for a given reporting period. If a volume discrepancy is detected during a PR, the specific record should be identified in the remarks section of the Automated Fluid Minerals Support System (AFMSS). Coded as TH/PR, RA/PR or OV/PR.

If the FO conducts a production inspection on a case, and conducts a complete records analysis on the same case, enter two separate inspections into AFMSS. Enter a PI inspection for the production inspection and enter an RA for the records analysis.

RV - Records Verification Review: An office only review of production records (e.g., spot checking meter calibration reports, spot checking tank gauging reports, reviewing OGORs, etc.) for a given period(s).

If the FO conducts a production inspection on a case, and conducts a records verification review on the same case independently of the production inspection (e.g., reviews a meter calibration report 6 months after closing the production inspection), enter two separate inspections into AFMSS. Enter a PI inspection for the production inspection and an RV for the records verification. If the FO reviews a record (e.g., meter calibration report) as part of their measurement activity during a production inspection, only enter the PI inspection; do not enter a separate RV.

RR - OGOR Review: An office review of only OGORs in conjunction with a production inspection (PI), records analysis inspection (RA), or records verification review (RV). Coded as PI/RR, RA/RR, RV/RR, BU/RR, or TH/RR. If the RR is being conducted during an oversight (OV) inspection, the RR may include the review of AFMSS data, OGOR data, well, lease, unit, and/or CA official files. Coded as an OV/RR.

The FOs are encouraged to secure access to the Office of Natural Resources Revenue (ONRR) BRIO Portal website to obtain current OGOR data. Production data reported to individual States is not an acceptable method for comparison. To request access to the ONRR BRIO Portal, contact the ONRR Help Desk at 303-231-3333.

Records reviews (coded as PI/RR, RA/RR, RV/RR, BU/RR, or TH/RR) must include, at a minimum, a review of the ONRR OGOR, Form 4054, to analyze trends and production history, and identify potential reporting errors. This includes a review of the disposition of production (on-hand, sold, transferred, lost, used on lease,) on the OGOR reports for the past 6 months and the production average report for the past 3 years.

Review the following suggested areas on the OGOR report as part of the RR or PR activity and are example indicators of possible discrepancies in production handling and reporting pursued if found during an OGOR review:

1. Verify reported well status against production documents submitted by the operator for review (such as the daily gauge reports).
2. One or more days of production reported with zero volumes of oil, gas, and/or water.
3. Zero days produced with reported gas, oil, and/or water volumes.
4. Extreme variations in reported production volumes when the number of days produced remained constant.
5. A pattern of reporting identical volumes or consistent fluctuations, such as variations by one-fourth, one-half, or two-thirds; or changes of 200, 400, or 600 barrels for many months.
6. Irregularities of volumes listed in the “Other” (disposition of production) column.
7. Discrepancies between the OGOR and any other information obtained during the inspection activities.
8. Production volumes and/or wells reported on the wrong case.
9. Unreasonable “used on lease” or “flared” or “vented” volumes (if applicable verification of approval required for these categories).
10. Discrepancies between beginning and ending stock on hand.

Following are some examples of inspections that FOs may conduct using these codes:

If the case reports (OGOR) both oil and gas production and all appropriate records are reviewed, use the RA Inspection Type code.

If the case reports (OGOR) both oil and gas production and only the records from either oil or gas, and not both are reviewed, use the RV Inspection Type code.

If the case reports (OGOR) only oil or gas and all appropriate records are reviewed, use the RA Inspection Type code.

Reviewing and verifying a run ticket (or several run tickets) on a case; coded as RV/TV.

Reviewing and verifying a proving report from a LACT on a case; coded as RV/MP
Reviewing OGORs on a case to look for “red flags” such as missing OGORs, excessive used on lease volumes, missing wells, etc.; coded as RV/RR.

Review and verify a meter calibration (or several meter calibrations) on a case; coded as RV/MC.

IW - Idle Well Inspection: An inspection of a well that has had zero production reported for the previous 7 years.

Any well on the Idle Well Risk Analysis Report (IEP.2SR) that is inspected regardless of other inspection activities performed on the case will have a separate idle well (IW) inspection coded in AFMSS. All IW inspections must include the following activity codes:

- Well Status (WS)
- Surface/Environmental - Producing (SP)

WS - Well Status Check: An activity to verify the actual status of a well compared to the reported status. This activity is required with an idle well (IW) inspection or when the primary purpose of the inspection is to check a well status, which may be part of the idle/orphan well initiative. Inspectors can also use this activity with other inspection types when the primary purpose of the inspection is to check a well status. Do not record as a separate inspection activity if a status check is conducted in conjunction with other inspection activity types. Coded as PI/WS, ES/WS, IW/WS, TH/WS, or OV/WS.

Inspectors should only use the PI/WS inspection code combination if they perform no other production inspection activities on the case during the current fiscal year.

BU - Beneficial Use: An office review of records to determine if volumes claimed for beneficial use on the OGOR are reasonable, allowable, and in accordance with approval, if applicable.

Use this code when reviewing records only for beneficial use and not associated with any other inspection (PI, RA, RV) that is opened, closed, or planned on being performed during the current fiscal year. This inspection is usually started as a specific request or Instruction Memorandum (IM).

- The ONRR requests verification that the volumes claimed for beneficial use on a specific case/operator combination is reasonable or is approved (if approval is required) and no

other inspections have been opened, closed, or planned for the fiscal year is coded as BU/RR.

- If during or as a result of the BU it is determined an additional inspection is to be performed (during the fiscal year), complete the BU, open the appropriate new inspection (PI, RA, RV), and in the inspections “Remarks” of both explain the reason.
- An IM is issued requiring beneficial use review on a specific operator or on all cases where beneficial use meets specific requirements (100 percent of produced used for beneficial purposes). BU/RR is coded only on cases where no other inspections have been opened, closed, or planned (PI, RA, RV) for the fiscal year.
 - If during or as a result of the BU it is determined an additional inspection is to be performed (during the fiscal year), complete the BU, open the appropriate new inspection (PI, RA, RV), and in the inspections “Remarks” of both explain the reason.

Important Note: It is mandatory to review beneficial use during all OGOR Review (RR) or Production Records Review (PR) inspections.

Useful Links

WO-IM-2013-041, Request for Modified or Missing Oil and Gas Operations Report from the Office of Natural Resources Revenue

http://www.blm.gov/wo/st/en/info/regulations/Instruction_Memos_and_Bulletins/national_instruction/2013/im_2013_041__request.html

WO-IM-2012-068, Access to American Petroleum Institute Publications

<http://web.blm.gov/internal/wo-500/directives/dir-12/im2012-068.html>

WO-IM-2013-056, Oil and Gas Theft Reporting Guidelines and Format

http://www.blm.gov/wo/st/en/info/regulations/Instruction_Memos_and_Bulletins/national_instruction/2013/IM_2013-056.html

WO-IM-2011-196, Data Entry of Volumes and Periods of Review into the Automated Fluids Minerals Support System

<http://web.blm.gov/internal/wo-500/directives/dir-11/im2011-196.html>

WO-IM-2012-181, Idle Well Review and Data Entry into the Automated Fluid Minerals Support System

http://www.blm.gov/wo/st/en/info/regulations/Instruction_Memos_and_Bulletins/national_instruction/2012/IM_2012-181.html

WO-IM-2012-161, This Instruction Memorandum (IM) clarifies guidance in documenting and performing oversight inspections of the Inspection and Enforcement (I&E) program.

http://www.blm.gov/wo/st/en/info/regulations/Instruction_Memos_and_Bulletins/national_instruction/2012/IM_2012-161.html

WO-IM-2012-191, Oil and Gas Field Managers Training Requirements

http://www.blm.gov/wo/st/en/info/regulations/Instruction_Memos_and_Bulletins/national_instruction/2012/IM_2012-191.html

WO-IM-2012-029, Policy for Wearing of Flame-Resistant Clothing in Oil and Gas Drilling, Well Servicing/Workover, Well Abandonment, and Production-Related Operations

http://www.blm.gov/wo/st/en/info/regulations/Instruction_Memos_and_Bulletins/national_instruction/2012/IM_2012-029.html

WO-IM-2013-033, Fluid Minerals Operations – Reducing Preventable Causes of Direct Wildlife Mortality

http://www.blm.gov/wo/st/en/info/regulations/Instruction_Memos_and_Bulletins/national_instruction/2013/IM_2013-033.html

WO-IB-2013-104, Availability MS 3809 Manual – Surface Management and 3809-1 Handbook – Surface Management

http://www.blm.gov/wo/st/en/info/regulations/Instruction_Memos_and_Bulletins/national_information/2012/IB_2012-104.html

OC-IM-2011-037 - National Operations Center (NOC) Production Accountability Review (PAR) Communication Protocols

http://teamspace/oc/sites/prog_rmfoia/NOC%20Instruction%20Memorandums%20IM%202011/IM%20OC-2011-037.pdf

International Association of Drilling Contractors (IADC) Safety Alerts

<http://www.iadc.org/safety-alerts/>

BLM Oil and Gas Home Page

http://www.blm.gov/wo/st/en/prog/energy/oil_and_gas.html

Intermountain Oil and Gas Best Management Practices Project

<http://www.oilandgasbmps.org/>

FracFocus Chemical Disclosure Registry

<http://fracfocus.org/>

Onshore Energy and Mineral Lease Management Interagency Standard Operating Procedures (under “Links)

<http://www.blm.gov/wo/st/en/prog/energy.html>