

US EPA ARCHIVE DOCUMENT

**Louisiana Multimedia Oil and Gas Environmental Results Program
Progress Report
July 2011 – Sept 2011**

Project Synopsis

The Louisiana Environmental Results Program (ERP) seeks to develop compliance assistance and outreach materials for the oil and gas exploration and production industry. The effectiveness of these materials will be quantified by statistically analyzing baseline compliance rates to compliance rates measured after development and delivery of assistance and outreach materials. Numerous challenges have delayed progress of this project, but while resource drain is still ongoing due to hurricane recovery efforts, objectives are being met.

The internal DEQ representatives are indicated below:

Office of Environmental Services

Heather Babin
Scott Guilliams
Bryan Johnston
Jim Davies
Kermit Wittenburg
Marcia Wittenburg
Scott Pierce

Office of the Secretary

Jeffrey Baker
Rodney Mallet
Tomeka Prioleau
Yanfu Zhao

Office of Environmental Compliance

Dirk Kavanagh
Dwight Bradshaw
Wayne Slater
Jane LaCour
Richard Ober
Cheryl Easley
Joette Kenaley

Project Manager

Chris Piehler

Narrative Discussion

The Louisiana Environmental Results Program finalized a contract with an external source to provide an initial draft of the “Field Guide”. Dialogue with the vendor on expectations of the field guide was the focus of this quarter’s activities.

Once the “Field Guide” is completed, distribution of a draft to stakeholders will occur and subsequent regional meetings to discuss with stakeholders will be held. Once the “Field Guide” is finalized with stakeholder comment on the draft, the document will be distributed to industry officials representing the companies subject to the initial baseline compliance evaluation. After ample opportunity for companies to assimilate and apply the guidance as they see fit, a final compliance evaluation effort will be conducted by regulatory inspectors at facilities owned by companies subject to the baseline compliance evaluation but at different facilities than those inspected during baseline. The results of this final effort will be compared with the baseline compliance rates, providing a measure of the effect of this effort of outreach meetings and materials on compliance rates within the industry.

Project Table and Milestones

The following is a list of project tasks, descriptions, timelines and status. Start and end dates reflect calendar quarters.

Task	Description	Start Date	End Date	Status/Notes
Final Grant Proposal	LA will work in a cooperative fashion with EPA to refine and more fully develop a work plan as a first step after the grant is approved, and periodically throughout as milestones are met and reviewed.	7/10/2006, amendment begun 8/1/2008	November 2008	Complete
Outreach	Outreach to internal and external stakeholders (including targeted facilities) about the project	Upon grant award	June 2009 for draft material development, outreach will continue through assistance material distribution (final)	Mostly on target: Established venues and materials for 5 regional ERP stakeholder meetings and one opportunistic outreach event at the Gulf Coast Environmental Affairs Group in New Orleans. Development of the "Field Guide" initiated in the next quarter (1 st of 2011)
QAPP Submission	Development and submission of QAPP to EPA for approval	Upon grant award, revision initiated September 2008	December 2008	Complete
Facility Identification	Compile list of oil and gas facilities from reliable sources	December 2006	September 2008	Baseline complete, post-outreach list to be developed after outreach and prior to initiating post-outreach inspections
Statistical Method	Finalize statistical method	September 2006	September 2008	Completed

Task	Description	Start Date	End Date	Status/Notes
Data input and management	Data systems modifications and data input processes to cost effectively input and manage ERP inspection information	September 2006	To be finalized in quarter following this progress report (December 2008)	Complete: Baseline Compliance information entered into inspections database.
Performance Tracking	Development of EBPIs and BMPs	September 2006	June 2009, in tandem with draft outreach material development	Underway, discussions with stakeholder at regional meetings have provided valuable insight
Develop Inspection Forms	Multi-media inspection forms and training for inspectors	September 2006	June 2008	Complete
Outreach assistance materials	Develop workbooks, informational assistance materials, and workshop curriculum	September 2006	Draft by June 2009	Complete: Established venues and materials for 5 regional ERP stakeholder meetings and one opportunistic outreach event at the Gulf Coast Environmental Affairs Group in New Orleans.
Baseline Inspections	Inspections at facilities to establish baseline compliance rates for performance measures	June 2008	June 2009	Complete
Baseline assessment	Assessment of baseline inspection data to establish baseline compliance rates for performance measures	April 2009	June 2009, new end date February 2010	Data entry and retrieval mechanisms tested and functional. Queries have been made and data are available.
Facility assistance	Delivery of draft compliance and technical assistance to industry in the form of the "Field Guide to Environmental Compliance for the Louisiana Oil and Gas Industry"	June 2009	January 2012	Draft field guide initially anticipated by end of 2009, will now be developed via contract due to unforeseen challenges to available staff

Task	Description	Start Date	End Date	Status/Notes
				resources
Self-certification	Implementation of a voluntary facility self-certification approach	September 2006	Draft December 2011, final dependent upon industry input	Concept complete, software and outreach adjustments underway. Ideas derived from stakeholders have demonstrated significant challenges with feasibility of this aspect.
Assessment of self-certification results	Assessment of self-certification data and identifying opportunities for randomized follow-up to determine effectiveness	June 2009	December 2009, new end date expected to be Spring 2012	Not begun, needs input from stakeholders, this likely to be postponed until Spring 2012.
Post-outreach inspections	Inspections at facilities to establish whether performance measures have changed since baseline inspections	August 2011	May 2012	Not begun
Data assessment	Assessment of baseline, self-certification, and post-outreach inspection data to quantify and report measured effectiveness of outreach tools and approaches	December 2012	June 2012	Not begun
Finalized ERP Outreach material availability	ERP documentation provided on website and in hard copy to interested parties	December 2009, new start date March 2011	June 2012	Not begun
Report to EPA	Final reporting on inspection findings, outreach effectiveness and tools and approaches associated with Louisiana Multi-media Oil and Gas ERP	June 2012	July 2012	Not begun