

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
WASHINGTON, D.C. 20240

October 3, 2002

In Reply Refer To:
3160 (310) N

EMS TRANSMISSION 10/07/2002
Instruction Memorandum No. 2003-010
Expires: 09/30/2004

To: All Field Officials

From: Assistant Director, Minerals, Realty and Resource Protection

Subject: Automated Fluid Minerals Support System Policy for Entry of Applications for Permit to Drill and Sundry Notice Information

Program Area: Fluid Minerals Operations

Purpose: Accurate, reliable data in the Automated Fluid Minerals Support System (AFMSS) is an integral part of the Fluid Minerals program. This Instruction Memorandum (IM) provides policy for data entry, and for maintenance of existing data, to ensure that AFMSS contains reliable data that conform to standards and consistency on a national basis. This IM implements guidelines to Field Offices for processing oil and gas permit information.

Policy/Action: Attachment 1 outlines guidelines for entering Application for Permit to Drill (APD) and Sundry Notice (Sundry) information into AFMSS. The data is used to provide workload accomplishment numbers that are subsequently tracked in the Management Information System for budget purposes. AFMSS data is also being used to obtain various statistics including number received, pending, disposition and reasons for approval delay. Therefore, it is imperative that Field Offices (FOs) timely enter and accurately track permit processing information.

FOs shall promptly enter all Notice of Staking (NOS), APD and Sundry permits upon receipt. Requests for approval submitted in letter format shall be considered a Sundry Notice and shall also be entered upon receipt.

During the processing of the APD, the appropriate specialist, when applicable, shall enter review information into the appropriate adjudication, surface, engineering, and geologic screens.

It is important to completely and accurately document information when the APD approval is outside the 35-day timeframe for Federal lands and the 30-day timeframe for Indian lands. FOs must review pending APD records and provide additional documentation if they have not been processed within the 30/35-day timeframe, as specified in the attached policy.

Timeframe: All FOs are required to implement the attached requirements upon issuance. Furthermore, all FOs are to develop oversight procedures to ensure that these requirements are implemented.

Budget Impact: These data entry standards, and implementation of oversight procedures, must be accomplished within existing funding.

Background: AFMSS was implemented nationally in October 1997. The AFMSS Project has systematically been providing formal guidance to FOs outlining system documentation policy by subject area as needed. The attached policy provides FOs with consistent guidelines for entering and maintaining permit information. Accurate data within the system will assist BLM in addressing concerns expressed from industry relating to the BLM processing time for APDs, and internal concerns regarding the accuracy of workload numbers being derived for MIS.

Manual/Handbook: The attached policy will be incorporated into the electronic AFMSS User Guide set of appendices.

Coordination: Coordination between each State Office and its FOs will be necessary to ensure that everyone who enters data into AFMSS implements these documentation requirements.

Contact: Questions regarding AFMSS should be directed to Paul Brown at (303) 236- 8586, Patty Ramstetter at (801) 539-4048 or Carol Larson at (406) 233-3655.

Signed by:
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Authenticated by:
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1 Attachment

1 - Policy for Entering APD and Sundry Notice Information (5 pp)

AFMSS POLICY FOR ENTERING APD AND SUNDRY INFORMATION

The following policy is adopted in an effort to provide consistency in the entry and maintenance of permit information (including permit reviews) in AFMSS. All users who have the capability to enter and maintain this information should be aware of these policies. Detailed instructions regarding data entry procedures can be found in the AFMSS User Guide. To access the User Guide, click on the Help button in the upper right hand corner of any AFMSS screen. Select User Guide from the cascading menu.

1. RULES FOR ENTERING AND PROCESSING APD INFORMATION

- A. All APDs, including those received electronically, shall be promptly entered into AFMSS within 5 business days upon receipt in the Field Office. Concern has been expressed from industry relating to the BLM processing time for APDs. To address this concern, APD information must be properly documented and entered into AFMSS within the 5 business days. AFMSS data is used to provide important information including number received, pending, disposition and reasons for approval delay.
- B. During the processing of the APD, the Field Office shall enter specialist review information. There are several screens in AFMSS that record various reviews performed during the processing of an APD (i.e., Surface, Geologic, Engineering, and Adjudication). These review screens track useful information regarding the permit and should be completed by the appropriate discipline. The review screens have the capability to attach remarks relating to the specific discipline. These remarks can be viewed by other reviewers or management. Remarks should be entered to help provide useful information.
- C. The APD approval screen contains date fields to assist in documenting regulatory timeframes. These dates shall be promptly entered as applicable. It is very important that **all** information on the APD Approval (GLB.81) screen is accurate and complete. Specific guidance regarding these dates is outlined below. The remarks connected to the APD Approval screen will be the remarks used to document reasons for delay in approval.
 - 1. The Received Date of the APD is initially entered into the "Well Header (GLB.90)" screen at the time the well information is being entered. This date will be the **actual date** that the APD was received in your office. The Received Date (Appl Recd) will autopopulate into the APD Approval screen from the Well Header screen.
 - 2. Enter the date the application is considered to be technically and administratively complete in the AAppl Cmpl@ field. Enter this date for all APDs requiring BLM approval.

There are varying opinions throughout BLM offices on how to determine

when an APD is technically and administratively complete. The regulations at 43 CFR 3162.3-1(d) and Onshore Order No. 1 both specifically state that:

A complete application consists of Form 3160-3 and the following attachments:

- (1) A drilling plan containing information required by regulation and appropriate orders and notices.
- (2) A surface use plan of operations containing information required by regulation and appropriate orders and notices.
- (3) Evidence of bond coverage as required by regulations, and
- (4) Such other information as may be required by applicable orders and notices.

The most common error in documenting the AAppl Cmpltd@ date is using the date when all information has been received AND all reviews have been performed and the APD is ready for approval.

Should an APD have deficiencies as outlined in Oil and Gas Onshore Order No.1, the review process will be ongoing up to the point where it is impossible to continue because of such deficiencies. The application is technically and administratively complete when all deficiencies of the four above stated references have been corrected,

Once an APD is complete, there are other factors that may cause approval delays. Examples include: other surface management agency review and concurrence, preparation of a NEPA document, public comment timeframes, weather conditions delaying cultural clearance or onsite visits, special permits, negotiations between the applicant and private landowner, special environmental concerns, State Historical Preservation Office review and/or concurrence, and Threatened and Endangered species consultation if required.

- D. Field Offices must document the reason(s) APDs are still pending past the regulatory processing timeframe. It is important to completely and accurately document information when the permit disposition is outside the 30/ 35-day timeframe. This policy does not address the timeframe for the "NOS Option" versus the "APD Option" as outlined in Onshore Order No.1. For each option, approval timeframes differ. It would be difficult, at best, to distinguish between these options when dealing with the approval records contained in AFMSS. Therefore, the application will be considered to be "delayed for approval (or other disposition)" when the Disposition Date of the APD is more than 30/35-days past the Application Complete Date (Appl Cmpl), regardless of the option used for submission.
1. Document any reasons for the approval (or other disposition) delay in the Approval Remarks. Do not document the reason under the review remarks. Remarks contained in individual review screens should pertain to that portion of the review only and not the overall approval or delay in approval of the APD. Although the remarks contained in the review screens provide important and useful information, the **Approval Remarks** will be used to determine the reason for the approval delay.
 2. Remarks should be brief and entered consistently. A suggested method for entering remarks for delayed APD approval:

"BLM-Caused Delay - Insufficient staff resources to complete processing in a timely manner."

"Non-BLM-Caused Delay - Due to adverse weather conditions, cultural clearance was delayed."
 3. If remarks need to be revised or have more information added, edit the existing remarks. Do not add new remarks to track events or receipt of documentation. Edit the existing remarks.
 4. For APDs approved within the 30/35-day timeframe, approval remarks are optional.

II. RULES FOR ENTERING AND PROCESSING OTHER APPROVAL INFORMATION

The objective of this policy is to outline the tracking and data entry requirements for all operator requests for approval other than for APDs, whether they are submitted as a Sundry Notice or in a letter format. For detailed information on entering Sundry information, refer to the AFMSS User Manual and follow the instructions outlined in the Operations: "Adding a New Sundry Notice" or "Adding a Sundry Notice for Multiple Wells, Facilities, or Cases Operated by the Same Operator" sections.

- A. All new Sundry Notices and/or letters requesting an approval (hereafter referred

to as Sundrys) shall be entered into AFMSS within 5 business days upon receipt in the appropriate BLM office. All Oral approvals shall also be documented in the system. Sundrys are entered into the system not only for tracking purposes, but also to provide each office with valuable information regarding the average workload they have on a yearly basis to process such requests. They also build the approval record for the 3160-11 Production Inspection sheet.

The approval record shall be tied to all the well(s) or facilities listed on the Sundry Notice or letter. If the request for approval pertains to the entire case, then the approval shall be tied to all active wells and/or facilities tied to the case.

- B. Old approvals for a well, facility, or case shall also be entered into AFMSS if the approval still pertains to ongoing operations. For example: commingling, off lease measurement, off lease storage, water disposal, variances, temporary abandonment, and flaring or venting approvals (to name just several) shall be entered into AFMSS. This could be a huge workload for some offices, depending on the quality of their data transferred from the old Automated Inspection Records System (AIRS) database. To accomplish this task, it is recommended that as inspections are conducted on active oil and gas cases, the approval records be reviewed and the missing approvals be identified and entered at that time. This is not to say that the inspector will be left “holding the bag” on getting approvals entered, since most do not have security clearance to enter approvals. The inspector will probably be the first to notice that there is an existing approval missing from the system and should notify the person responsible for entering the data. It will be the responsibility of each office to designate who is responsible for the entry of the approval information, based on available resources. This process should allow us over the next couple of years to catch all those outstanding Sundrys and get them into the system. All existing valid approvals shall be entered into the system prior to October 2004.
- C. Each person who reviews the Sundry shall document that review under the appropriate Sundry type category (either Oral Approval, Notice of Intent (NOI) or Subsequent Report (SR)). Reviewers are encouraged to document significant issues in the Remarks screen if applicable.
- D. Field Offices must adequately document the disposition of each Sundry within 5 business days of the Authorized Officer decision.
 - 1. Approval of the NOI or SR shall be documented under the appropriate Sundry Type category as soon as possible after approval is granted.
 - 2. Rejection, denial, cancellation, etc., of the Sundry shall also be documented under the appropriate Sundry Type category as soon as possible after such decision.
 - 3. Remarks are required to be entered for the Sundry under the Approval category so that users know exactly what was requested and approved or rejected, etc. You do not have to type verbatim what is on the Sundry, but

there should be enough information so that someone with an oil and gas background using standard terminology can look at the record and know what was requested and approved. Make sure to include any special conditions of approval that inspection staff need to be aware of monitoring purposes.

4. Enter SR information on the same line as its matching NOI in the AFMSS Sundry List for Well (SNT.38) window. This will allow the user to readily see the entire picture regarding the NOI approval and can call for an SR if necessary. The screen will show one document number for the NOI and the SR, but the system will count each Sundry type as a separate action. The Sundry Notice canned reports will also show each NOI and SR as a separate action, so those who count widgets will get the right numbers.
5. An NOI and/or an SR that follows an oral approval should also be entered on the same line in the SNT.38 screen.
6. Field Offices should also review the existing Sundry Notices classified as “Other” in the system to see if they are in the correct category. Additional Sundry Type categories were added to the system during FY99 that may cover some of your older Sundry approval records. AFMSS allows the user to change the type of an existing Sundry approval from the Sundry List Window.