

FREQUENTLY ASKED QUESTIONS

Environmental Protection Signage Standards at Oil and Gas Well Sites

Requirements for Proper Positioning of Signs at Well Sites
and the Placement of Tags at Wells
(Pennsylvania Oil and Gas Act 13 of 2012
Section 3211 (g) and (h))

The purpose of this Frequently Asked Questions (FAQ) document is to highlight changes in and address questions about the signage standards at oil and gas well sites and the placement of tags at wells. This FAQ should not be used in lieu of reference to Pennsylvania's Oil and Gas Act 13 of 2012 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.

Q: For conventional wells only, can a single sign satisfy the requirements of section 3211 (g) and (h) once a well has been drilled?

A: Yes, provided there is only a single well at the well site and the sign meets the combined requirements of 3211 (g) and (h) in that the sign is permanent, legible, conspicuously posted and affixed to the well or an immediately adjacent apparatus (such as a tank or flow lines) connected to the well.

Background: Act 13 of 2012 replaced Act 223 of 1984 and amended section 3211 (g) which states:

(g) Posting.--The well permit number and operator's name, address and telephone number shall be conspicuously posted at the drilling site during site preparation, including the construction of access roads, construction of the well site and during drilling, operating or alteration of the well.

This requirement is in addition to subsection h which states:

(h) Labeling.--The well operator shall install the permit number issued by the department in a legible, visible and permanent manner on the well upon completion.

DEP has interpreted these subsections as requiring two different notices – a sign that is posted prior to site construction and well drilling, and a traditional permanent well tag affixed to the well. Recent inquiries posed the question of whether a single sign could satisfy both 3211 subsections.

DEP has determined that a legally permissible interpretation of the law can allow for a single sign to meet both requirements if the sign satisfies all of the requirements of both subsections. In addition to the required information (permit number, operator's name, address, and telephone number) the sign must be permanent, legible, conspicuously posted, and located on the well. These requirements are addressed as follows:

Permanent: The sign must be of a durable material such as metal or plastic that is capable of withstanding the elements. Laminated paper signs or documents in a plastic bag do not meet this requirement.

Legible: While hand-written signs using a weather durable paint or marker may be used, the writing must be neat and easily readable.

Conspicuous: The common definition of this term is “standing out so as to be clearly visible; attracting notice or attention.” Thus, the sign must be posted in a manner that is readily visible by DEP or members of the public when approaching the well from the access road. The sign does not need to be capable of being read from the edge of the well site or access road, but the presence of the sign must be readily apparent from the edge of the well site or access road.

Posting Location: The sign must be affixed to the well. DEP will also accept signs that are affixed to immediately adjacent appurtenances that are connected to the well such as a tank or flow lines.