

**FORM
INSP**Rev
X/15**State of Colorado
Oil and Gas Conservation Commission**1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109

Inspection Date:

02/08/2019

Submitted Date:

02/18/2019

Document Number:

690101087**FIELD INSPECTION FORM**Loc ID 336528 Inspector Name: Maclaren, Joe On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**OGCC Operator Number: 47120Name of Operator: KERR MCGEE OIL & GAS ONSHORE LPAddress: P O BOX 173779City: DENVER State: CO Zip: 80217-**Status Summary:**

- ☐ THIS IS A FOLLOW UP INSPECTION
- ☐ FOLLOW UP INSPECTION REQUIRED
- ☐ NO FOLLOW UP INSPECTION REQUIRED

Findings:4 Number of Comments1 Number of Corrective Actions☒ Corrective Action Response Requested**ANY CORRECTIVE ACTION(S) FROM
PREVIOUS INSPECTIONS THAT HAVE NOT
BEEN ADDRESSED ARE STILL APPLICABLE****Contact Information:**

Contact Name	Phone	Email	Comment
Hamilton, Greg		Gregory.Hamilton@anadarko.com	
		cogccinspections@anadarko.com	
Canfield, Chris		chris.canfield@state.co.us	
Schlagenhauf, Mark		mark.schlagenhauf@state.co.us	
Whittington, Ellice		ellice.whittington@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
296725	WELL	PR	11/01/2018	GW	123-26884	BULTHAUP 39-6	EG
296726	WELL	PR	07/01/2018	GW	123-26885	BULTHAUP 16-6	EG

General Comment:

Engineering integrity inspection performed on February 8th, 2019 in response to initial form 19 spill report Doc #401925930 received by COGCC on 02/01/2019 that outlines: While putting the Bulthaup 39-6 well back into production, approximately 0.5 barrels of fluid were released from a hole in the associated flowline. On January 31, 2019, excavation activities were initiated, and visually impacted groundwater was observed in the excavation at approximately 2.5 feet below ground surface (bgs). Soil excavation activities are ongoing and will be summarized in a forthcoming supplemental Form 19 Spill/Release Report. Corrective Actions identified are located in the flowline section of this report. Photos uploaded can be accessed via link at end of report.

Inspected Facilities

Facility ID: 296725 Type: WELL API Number: 123-26884 Status: PR Insp. Status: EG

Flowline

#1	Type: Well Site	2 of Lines
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Flowline Description

Flowline Type: Well Site Size: 2" Material: Carbon Steel
 Variance: No Age: Contents: Multiphase

Integrity Summary

Failures: Spills: Yes Repairs Made: No
 Coatings: Yes External H2S: No Cathodic Protection: No

Pressure Testing

Witnessed: Test Result: Charted:

COGCC Rules(check all that apply)

☐ 1101. Installation and Reclamation ☒ 1102. Operations, Maintenance, and Repair ☐ 1103. Abandonment

Comment: COGCC Inspector met with the Anadarko contract foreman (with Prairie Oilfield Services) on location. (2) 2" FBE CS off location flowlines and (2) 1" HDPE gas supply flowlines associated with Bulthaup 39-6 and 16-6 wells were exposed in an excavation located approximately 100' SE of the facility/ battery and adjacent to the west side of WCR 3. A spill was reported as a result of a failure identified on the Bulthaup 39-6 wellhead/ off location flowline (flowlines run approx 1800 linear feet north from wellhead to separator). The cause of the failure is unknown at this time; however, it occurred in an area where the flowline is encased (in 4" steel pipe) as it runs under a marshy area (cattails) southeast of the facility pad. Contract crews were in the process of responding to the release and removing impacted groundwater from the casing pipe at the time of this field inspection. The flowline has been disconnected from the wellhead and at the tie in to the inlet of the horizontal separator at the facility.

Corrective Action: Provide COGCC engineering integrity inspector with the following information (via email):
 1) Root cause of flowline failure
 2) Description of flowline repairs or flowline replacements scheduled to be completed
 3) Measures taken to prevent a reoccurrence on this flowline; also measures taken to prevent failure on Bulthaup 16-6 flowline
 4) Future plans for this well and off location flowline
 5) Copy of charts/ data for flowline pressure testing completed on Bulthaup 39-6 (post repairs/ prior to returning to production).
 6) Pressure testing charts/ data for the Bulthaup 16-6 flowline (currently SI/ prior to returning to production)
 7) Update the corrective actions section of the supplemental form 19 to include recent/ accurate information
 8) Submit Form 44 information as required per COGCC rules 1101 and 1105 (also for abandonment as applicable)

Date: 04/08/2019

Facility ID: 296726 Type: WELL API Number: 123-26885 Status: PR Insp. Status: EG

COGCC Comments

Comment	User	Date
COGCC Integrity inspector was on location 2/06/19 and 2/08/19	maclarej	02/18/2019

As outlined in the Corrective Actions section of the supplemental form 19 Doc #401932410 received on 02/08/2019: A release occurred when fluid was released from a hole in a flowline while placing a well back into production. The flowline will be pressure tested and faulty infrastructure will be replaced. (Note: The CA's on the supplemental form 19 need to be updated as new information is obtained)	maclarej	02/12/2019	
Comments added to the Supplemental form 19 report Doc #401932410 by COGCC EPS staff (2/08/2019): Operator must submit root cause of failure by means of a Supplemental Form 19. The Spill/Release Detail Report states that all spilled fluids were recovered. That statement is not consistent with impacts to soils and ground water described in the Initial and Supplemental Form 19s and observed by COGCC personnel. Further, a COGCC Integrity Management Inspector witnessed ongoing recovery of produced fluids at the subject location on 02/08/2019. In short, the volumes reported are suspect and the statement that all spilled fluids were recovered as of 02/07/2019 is incorrect. The operator must correct volumes by means of a Supplemental Form 19. Operator must also submit the basis for determining the volumes of produced fluids spilled.			

Attached Documents

You can go to COGCC Images (<https://cogcc.state.co.us/weblink/>) and search by document number:

Document Num	Description	URL
401942890	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4737419
690101091	Photo Log	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4737418