

**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:

12/20/2019

Submitted Date:

12/23/2019

Document Number:

690101612**FIELD INSPECTION FORM**Loc ID 450354 Inspector Name: Maclaren, Joe On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**OGCC Operator Number: 46290Name of Operator: KP KAUFFMAN COMPANY INCAddress: 1675 BROADWAY, STE 2800City: DENVER State: CO Zip: 80202**Status Summary:**

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

Findings:3 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
		dnr_cogccenforcement@state.co.us	
Schlagenhauf, Mark		mark.schlagenhauf@state.co.us	
Canfield, Chris		chris.canfield@state.co.us	
		cogcc@kpk.com	
Knop, Max		MKnop@kpk.com	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
444630	TANK BATTERY	AC	01/29/2016		-	Charter Schneider Tank Battery	EG
444879	SPILL OR RELEASE	CL			-	SPILL/RELEASE POINT	EG
450354	LOCATION	AC			-	Charter Schneider Tank Battery	EG

General Comment:

Follow up field inspection in response to COGCC FIR DOC #690101420; CORRECTIVE ACTION REQUIRED NOT COMPLETED. Details are outlined in the flowline section of report. Photo Log uploaded.

ALL CORRECTIVE ACTION(S) FROM PREVIOUS/ OTHER INSPECTIONS THAT HAVE NOT BEEN ADDRESSED ARE APPLICABLE

Inspected Facilities

Facility ID: 444630	Type: TANK	API Number: -	Status: AC	Insp. Status: EG
Facility ID: 444879	Type: SPILL OR	API Number: -	Status: CL	Insp. Status: EG
Facility ID: 450354	Type: LOCATION	API Number: -	Status: AC	Insp. Status: EG

Flowline

#1	Type:	of Lines
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Flowline Description

Flowline Type: Size: Material:
 Variance: Age: Contents:

Integrity Summary

Failures: Spills: Repairs Made:
 Coatings: H2S: Cathodic Protection:

Pressure Testing

Witnessed: Test Result: Charted:

COGCC Rules(check all that apply)

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

Comment: CORRECTIVE ACTION REQUIRED NOT COMPLETED BY OPERATOR:

Exposed flowline cut ends exist around the sides of the excavation. The cut ends of numerous flowlines are open to atmosphere and have not been sealed (plugged or capped); and are not marked, locked or tagged out. In addition, recent trenching activity on the north side of the excavation has exposed flowlines; ends have been cut and are currently open to atmosphere. Inactive/ unmarked exposed flowline cut ends are considered unused equipment and shall comply with COGCC rule 603.f.

Note: KPK personnel were performing excavation work at this location during this field inspection. Flowline segments have been removed from the excavation area. Operator has not communicated with COGCC regarding the corrective action and/ or an estimated time frame of bringing the site into compliance in regard to 603.f

Corrective Action: Locate and remove unused/ inactive flowlines, or:
 1) Comply with COGCC rule 603.f; Mark flowline risers and seal ends; 30 days to remove unused and unmarked flowline risers. Abandon flowlines in place per COGCC rule 1105 (cut ends to be sealed and risers removed below grade). Note: covering ends with tape is not an acceptable means of sealing; Use of bull plugs, welded/ or HDPE caps and pumping of cement (flow-fill) are acceptable means of sealing the ends of flowlines to be abandoned in place.
 2) Repair active flowlines and contact COGCC EG inspector to witness flowline pressure testing prior to returning to service (verification of repairs completed).

Date: 10/29/2019

COGCC Comments

Comment	User	Date
<p>As outlined in COGCC FIR DOC #690101420 dated 9/24/2019:</p> <p>REM 9522 began with COGCC approval of Form 27 (Document No. 2525911) submitted by the operator on 02-19-2016 in response to the discovery of Spill/Release Point 444879. During excavation/ remediation work numerous flowlines were unearthed and exposed (with segments running across excavation area cut out). Exposed flowline cut ends exist around all sides of the excavation. The flowlines (active and inactive) are comprised of varying materials (and sizes) and have not been identified, located or marked. The cut ends of the flowlines are open and have not been sealed (plugged or capped); and are not locked or tagged out. The flowlines appear to be associated with both historical operations at the facility/ battery as well as recent operations. Several flowlines are currently tied into (SI) wells (potential pressure source). The unmarked and exposed flowline cut ends are considered flowline risers (must comply with COGCC rule 603.f).</p>	maclarej	12/23/2019

Attached Documents

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

Document Num	Description	URL
402270300	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5020205
690101613	Photo Log	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5020198