

**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:

09/21/2020

Submitted Date:

09/22/2020

Document Number:

690102098

FIELD INSPECTION FORMLoc ID _____ Inspector Name: _____ On-Site Inspection ☐
Maclaren, Joe 2A Doc Num: _____**Operator Information:**

OGCC Operator Number: 46290

Name of Operator: KP KAUFFMAN COMPANY INC

Address: 1675 BROADWAY, STE 2800

City: DENVER State: CO Zip: 80202

Status Summary:

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

Findings:

2 Number of Comments

1 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
		cogcc@kpk.com	
Schlagenhauf, Mark		mark.schlagenhauf@state.co.us	
Oakman, Kari		kari.oakman@state.co.us	
Knop, Max		mknop@kpk.com	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
478005	SPILL OR RELEASE	AC	09/15/2020		-	H. Huett Consolidation Release	EG

General Comment:

Engineering Integrity Inspection performed on September 21st, 2020 in response to initial form 19 spill report Doc #402488815 received by COGCC on 09/14/2020 that outlines: Landowner reported observed flowline release that had surfaced on his property. Release occurred along KPK's Huett, Henry E Consolidation line; a 6-inch carbon steel flowline. KPK shut-in associated wells and brought in a vac truck to depressurize the system. A vac truck was also used to remove any pooled liquids at the release location.

Corrective Actions identified during this field inspection are outlined in the flowline section of report. Photos uploaded.

Inspected Facilities

Facility ID: 478005 Type: SPILL OR API Number: - Status: AC Insp. Status: EG

Flowline

#1	Type:Non-Well Site	of Lines	
----	--------------------	----------	--

Flowline Description

Flowline Type: Non-Well Site Size: 6" Material: Carbon Steel
 Variance: No Age: 20+ Yrs Contents: Crude Oil

Integrity Summary

Failures: Spills: Yes Repairs Made: Yes
 Coatings: H2S: No 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: COGCC Inspector was on site on 9/16/20 & 9/21/20. A failure occurred on the 6" carbon steel H. Huett crude oil consolidation line resulting in a release (at approximately 40.043630, -104.854920). The cause of the failure is unknown at this time; excavation in the area of the spill did not expose the pipeline at the failure point. KPK is in the process of completing repairs to the line. (2) bellhole excavations were observed exposing the 6" off location flowline; east of the release point at approx 40.043624, -104.854548 and west of the release point at approx 40.04364, -104.855826. The OLF has been cut in both excavations; approximately 400' of rolled 3" DR 11 HDPE pipe has been stung/ slip lined inside the existing 6" carbon steel line from bellhole to bellhole, inside the pipe across the point of release. Cut ends to be re-connected using carbon steel to poly (HDPE) transitions. In addition, (1) 2" CS off location flowline was also exposed in the excavations. Spill response, excavation and remediation activities are currently in progress.

Corrective Action: Update CA section of supplemental form 19 spill report to include the following information pertaining to compliance of COGCC series 1100 flowline regulations:
 1) Root cause of flowline failure(s) resulting in this release (final determination).
 2) Measures taken to prevent a recurrence.
 3) Detailed written description of all flowline repair, replacement and abandonment work completed (at spill ID #478005).
 4) Perform OLF flowline pressure testing and verify integrity of repairs/ reconnections completed prior to returning well(s) to production (rule 1102.j.4 and 1102.O). Upload pressure testing chart to COGCC Form 19 subsequent.
 5) Ensure associated wells are SI/ OOSLAT applied by operator to prevent unintentional release per 1102.j.7 (prior to and during time of repair).
 6) Repair all active flowlines intended for return to service; or historically abandoned/ out of service flowlines exposed in the excavation must be abandoned per COGCC rule 1105 (ends sealed per 1105.e.4).

Date: 10/26/2020

Attached Documents

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

Document Num	Description	URL
690102099	Photo Log	http://ogccwebblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5253207