

**FORM
INSP**Rev
X/20

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:

11/01/2021

Submitted Date:

11/05/2021

Document Number:

690102680

FIELD INSPECTION FORM
 Loc ID 318212 Inspector Name: Maclaren, Joe On-Site Inspection ☐ 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
Gorka, Ray		RGorka@kpk.com	
Schlagenhauf, Mark		mark.schlagenhauf@state.co.us	
,		cogcc@kpk.com	
Canfield, Chris		chris.canfield@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
240886	WELL	PR	05/26/1976	OW	123-08674	UPRR 43 PAN AM I 5	EG

General Comment:

COGCC Engineering Integrity Inspection performed on November 1st 2021 in response to initial form 19 spill report Doc #402852194 received on 10/25/2021 that outlines: An initial spill of 15 Gallons was discovered on 9/18/21, but was determined to be non-reportable based on KPKs internal investigation and volume calculations. KPK has now encountered historical contamination at a depth of 8ft. Based on current excavation activities and now that over ten yards of contaminated material has been removed, KPK believes that the potential volume of historical contamination was greater than one barrel.

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

Inspected Facilities

Facility ID: 240886 Type: WELL API Number: 123-08674 Status: PR Insp. Status: EG

Flowline

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

Flowline Type: Non-Well Site Size: 4" Material: Poly
 Variance: No Age: 20+ Yrs Contents: Multiphase

Integrity Summary

Failures: Spills: Yes 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: COGCC Integrity Inspector on site on 11/01/2021. No KPK personnel were on site at the time of this field inspection. The UPRR 43 Pan Am I 5 well is SI; however no OOSLAT is in place. An open excavation (measuring approximately 25' x 25') was observed @ approx 40.057203, -104.954217. (2) flowlines were exposed in the excavation; (1) 2" OD CS OL flowline; (1) 4" OD HDPE OL flowline. (3) cut ends of the flowlines exposed in the excavation have been bull plugged. The cause and point of flowline failure was not identified during this inspection. Flowline repair work has been initiated but not completed. Also, (2) additional flowline cut ends (appear to be historically abandoned lines) are present in the south wall of the excavation; open ends are not currently sealed (1105.e.4). Excavation/ remediation work at the reportable spill is in progress.

Corrective Action: Communicate information requested below to COGCC Integrity Inspector and add to CA section of COGCC supplemental form 19 spill report (compliance of COGCC series 1100 flowline regulations):
 1) Outline root cause of failure resulting in spill (1104.k. Integrity Failure Investigation/ Operator Determination)
 2) Measures taken to prevent a recurrence of failure (1102.I Corrosion Control/ 1104. Integrity Management)
 3) Description of flowline repair work completed (1102.j. Repair)
 4) Confirm integrity of flowline repairs/ reconnections completed prior to returning flowline to service (1102.j.4 and 1102.O). Contact Inspector with schedule of pressure testing.
 5) Ensure flowline(s) are isolated and depressurized; associated wells and isolation valves are SI/ OOSLAT to prevent unintentional release per 1102.j.7 (ASAP/ prior to and during time of repair).
 6) Historically abandoned/ out of service flowlines exposed in the excavation must be abandoned per COGCC rule 1105 (ends sealed per 1105.e.4).

Date: 12/06/2021

Attached Documents

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

Document Num	Description	URL
690102691	Signage and (SI) wellhead	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5573582
690102692	Impacted soils stockpile	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5573583
690102694	View of excavation and flowlines exposed	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5573584
690102695	View from wellhead N to flowline excavation	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5573585