

**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:

08/24/2022

Submitted Date:

08/25/2022

Document Number:

690103156**FIELD INSPECTION FORM**Loc ID _____ Inspector Name: _____ On-Site Inspection ☐
Maclaren, Joe 2A Doc Num: _____**Operator Information:**OGCC Operator Number: 46290Name of Operator: KP KAUFFMAN COMPANY INCAddress: 1700 LINCOLN ST STE 4550City: DENVER State: CO Zip: 80203**Status Summary:**

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

Findings:2 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
Graber, Nikki		nikki.graber@state.co.us	
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Anderson, Laurel		laurel.anderson@state.co.us	
Gorka, Ray		rgorka@kpk.com	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
479348	OFF-LOCATION FLOWLINE	AC	02/10/2021		-	Wellhead Line 34SWNW	EG
482755	SPILL OR RELEASE	AC			-	Rodgers #1 Flowline	EG

General Comment:

COGCC Engineering Integrity Inspection performed on August 19th, 2022 in response to initial form 19 spill report Doc #403135067 received on 08/13/2022 that outlines: Around 6PM Friday night homeowner discovered oil leaking out of the ground, called the Fire Dept who contacted KPK who shut in the well and fenced off the area.

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

Inspected Facilities

Facility ID: 479348 Type: OFF- API Number: - Status: AC 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: Carbon Steel
 Variance: No Age: 20+ Yrs Contents: Multiphase

Integrity Summary

Failures: External Corrosion 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 Inspector was on site on 08/19/22 & 08/24/22; COGCC Integrity Inspector met with KPK personnel. A failure of the 4" carbon steel consolidation flowline (referred to as Rodgers #1 OLF) resulted in the release (at approximately 40.094913, -104.993423). Per communication with KPK personnel, the root cause of the failure appears to be external corrosion at the 6 o'clock position of the pipe. A fenced 5' x 5' hydro-excavation exposed the flowline(s); external coating wear/ damage observed on flowlines and a bolted clamp was observed in place over the hole in the 4" flowline. KPK is in the process of completing repairs to the 4" flowline. (2) bellhole excavations were observed exposing the flowline; (1) west of the release point at approx 40.094913, -104.996437 and (1) east of the release point at approx 40.094913, -104.993022. The 4" OLF is being cut in both excavations; an estimated 950' linear feet of 3" OD DR 11 rolled HDPE pipe to be be stung/ slip lined inside the existing 4" carbon steel line from bellhole to bellhole, inside the pipe across the point of failure/ release. Cut ends to be re-connected using carbon steel to poly (HDPE) transitions. Tracer wire to be installed. Additional flowlines were exposed in the excavations; along with flowline tie in's to gathering. (1) 20" OD CS off location flowline was observed in the bellhole excavations; this flowline and the Rodgers #1 flowline (being repaired) appear to be the same OLF's in the same ROW as the OLF's observed in the Morgan A-1 release (Spill ID #481051). Excavation and remediation activities are in process.

Corrective Action: Document information outlined below on the CA section of COGCC supplemental form 19 spill report to include the following (compliance of COGCC series 1100 flowline rules):
 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 (via pressure testing) prior to returning flowline to service (1102.j.4 and 1102.O)
 5) Ensure flowline(s) are isolated and depressurized; associated wells and isolation valves are SI/ OOSLAT to prevent unintentional release per 1102.j.7 (prior to and time of repair).
 6) Any historical/ out of service flowlines exposed in the excavation must be abandoned per COGCC rule 1105 (ends sealed per 1105.e.4).

Date: 09/26/2022

Facility ID: 482755 Type: SPILL OR API Number: - Status: AC Insp. Status: EG

Attached Documents

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

Document Num	Description	URL
403147387	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5840112
690103157	Photo Log	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5840111