

FORM INSP
Rev 05/11

State of Colorado
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



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Inspection Date:
09/15/2015

Document Number:
674602268

Overall Inspection:

ALLEGED VIOLATION

FIELD INSPECTION FORM

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection	2A Doc Num:
	<u>443095</u>		<u>Maclaren, Joe</u>	<input type="checkbox"/>	

Operator Information:

OGCC Operator Number:	<u>10000</u>
Name of Operator:	<u>BP AMERICA PRODUCTION COMPANY</u>
Address:	<u>501 WESTLAKE PARK BLVD</u>
City:	<u>HOUSTON</u> State: <u>TX</u> Zip: <u>77079</u>

- THIS IS A FOLLOW UP INSPECTION
- FOLLOW UP INSPECTION REQUIRED
- NO FOLLOW UP INSPECTION REQUIRED
- INSPECTOR REQUESTS FORM 42 WHEN CORRECTIVE ACTIONS ARE COMPLETED

Contact Information:

Contact Name	Phone	Email	Comment
Schlagenhauf, Mark		mark.schlagenhauf@state.co.us	
Labowskie, Steve		steve.labowskie@state.co.us	
Ellsworth, Stuart		stuart.ellsworth@state.co.us	
Beebe, Sabre	970-375-7530	Sabre.Beebe@bp.com	SW Insp Reports
SW, BP		SanJuanCOGCC@bp.com	SW Insp Reports
Fischer, Alex		alex.fischer@state.co.us	
Hughes, Jim		jimo.hughes@state.co.us	
Weems, Mark		mark.weems@state.co.us	

Compliance Summary:

QtrQtr:	Sec:	Twp:	Range:				
Insp. Date	Doc Num	Insp. Type	Insp Status	Satisfactory /Action Required	PA P/F/I	Pas/Fail (P/F)	Violation (Y/N)
08/31/2015	674900752	AC	EI	ALLEGED VIOLATION			Yes

Inspector Comment:

On September 14th, 2015 COGCC SW Field Inspector conducted a flowline integrity inspection at the location where a recent produced water spill occurred. The release was reported to COGCC verbally on 8/31/15 and spill report #400893645 was submitted on 9/1/15. This spill release point ID is #443095. An NOAV Doc #200437191 was issued and sent via certified mail on 9/14/2015. This field inspection was conducted as repairs were being made on the flowline at and near the point of release. Details regarding the observations made during this field inspection are located in the comment section of this report. Photos uploaded can be accessed at the end of this report.

Related Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
443095	SPILL OR RELEASE	AC	09/11/2015		-	SPILL/RELEASE POINT	AC <input checked="" type="checkbox"/>

Equipment:

Location Inventory

Location

Emergency Contact Number (S/A/V): _____

Corrective Date: _____

Comment: _____

Corrective Action: _____

Spills:

Type	Area	Volume	Corrective action	CA Date
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Multiple Spills and Releases?

Venting:

Yes/No	Comment
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Flaring:

Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
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Predrill

Location ID: 443095

Site Preparation:

Lease Road Adeq.: _____ Pads: _____ Soil Stockpile: _____

S/A/V: _____

Corrective Action: _____ Date: _____ CDP Num.: _____

Form 2A COAs:

S/A/V: _____ **Comment:** _____

CA: _____ **Date:** _____

Wildlife BMPs:

S/A/V: _____ **Comment:** _____

CA: _____ **Date:** _____

Stormwater:

Comment: _____

Staking:

On Site Inspection (305):

Surface Owner Contact Information:

Name: _____ Address: _____

Phone Number: _____ Cell Phone: _____

Operator Rep. Contact Information:

Landman Name: _____ Phone Number: _____

Date Onsite Request Received: _____ Date of Rule 306 Consultation: _____

Request LGD Attendance: _____

LGD Contact Information:

Name: _____ Phone Number: _____ Agreed to Attend: _____

Summary of Landowner Issues:

Summary of Operator Response to Landowner Issues:

Onsite Inspection Memorandum Summarizing Discussions at Inspection as Attachment:

Facility

Facility ID: 443095 Type: SPILL OR API Number: - Status: AC Insp. Status: AC

Environmental

Spills/Releases:

Type of Spill: WATER Description: Produced Water Estimated Spill Volume: 92

Comment: Supplemental spill report shall be submitted by corrective action date listed. Per Rule 906.c., operator shall submit a Form 27 Site Investigation and Remediation Work Plan to SW EPS by September 21, 2015; (EI field inspection doc #674900752 conducted on 08/31/2015).

Corrective Action: Submit a supplemental spill report by CA date. Date: 09/10/2015

Reportable: YES GPS: Lat 37.183749 Long -107.818776

Proximity to Surface Water: 260 Depth to Ground Water: 70

Water Well:

DWR Receipt Num: _____ Owner Name: _____ GPS : _____ Lat _____ Long _____

Field Parameters:

Sample Location: _____

Emission Control Burner (ECB): _____

Comment: _____

Pilot: _____ Wildlife Protection Devices (fired vessels): _____

Reclamation - Storm Water - Pit

Interim Reclamation:

Date Interim Reclamation Started: _____ Date Interim Reclamation Completed: _____

Land Use: _____

Comment: _____

1003a. Debris removed? _____ CM _____ CA _____ CA Date _____

Waste Material Onsite? _____ CM _____ CA _____ CA Date _____

Unused or unneeded equipment onsite? _____ CM _____ CA _____ CA Date _____

Pit, cellars, rat holes and other bores closed? _____ CM _____ CA _____ CA Date _____

Guy line anchors removed? _____ CM _____ CA _____ CA Date _____

Guy line anchors marked? _____ CM _____ CA _____ CA Date _____

1003b. Area no longer in use? _____ Production areas stabilized ? _____

1003c. Compacted areas have been cross ripped? _____

1003d. Drilling pit closed? _____ Subsidence over on drill pit? _____
 Cuttings management: _____
 1003e. Areas no longer needed for drilling or subsequent operations for have been re-vegetated to 80% of pre-existing? _____
 Production areas have been stabilized? _____ Segregated soils have been replaced? _____

RESTORATION AND REVEGETATION

Cropland

Top soil replaced _____ Recontoured _____ Perennial forage re-established _____

Non-Cropland

Top soil replaced _____ Recontoured _____ 80% Revegetation _____

1003 f. Weeds Noxious weeds? _____

Comment: _____

Overall Interim Reclamation _____

Final Reclamation/ Abandoned Location:

Date Final Reclamation Started: _____ Date Final Reclamation Completed: _____

Final Land Use: _____

Reminder: _____

Comment: _____

Well plugged _____ Pit mouse/rat holes, cellars backfilled _____

Debris removed _____ No disturbance /Location never built _____

Access Roads Regraded _____ Contoured _____ Culverts removed _____

Gravel removed _____

Location and associated production facilities reclaimed _____ Locations, facilities, roads, recontoured _____

Compaction alleviation _____ Dust and erosion control _____

Non cropland: Revegetated 80% _____ Cropland: perennial forage _____

Weeds present _____ Subsidence _____

Comment: _____

Corrective Action: _____ Date _____

Overall Final Reclamation _____ Well Release on Active Location Multi-Well Location

Storm Water:

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment

S/A/V: _____ Corrective Date: _____

Comment: _____

CA: _____

Pits: NO SURFACE INDICATION OF PIT

COGCC Comments

Comment	User	Date
As outlined on NOAV doc #200437191 issued on 9/14/2015; A written plan addressing how this problem will be avoided in the future, to include engineering and pressure testing of this segment of flowline, management and training actions (as necessary) must be submitted to COGCC by October 8th, 2015.	maclarej	09/16/2015
Observations made during this flowline integrity field inspection: The failure occurred in 6" externally coated Carbon Steel pipe in a low lying area along the flowline ROW. Approximately 10 linear feet of produced water flowline had been cut out in the area of the failure. Localized pitting corrosion was observed in numerous areas along flowline at the 6 O'clock position (bottom of the pipe). A Bore Scope was run, prior to this inspection, to determine the lateral extent of the internal corrosion (Results Unknown). The pipeline crew/ foreman observed additional internal corrosion pits in the pipeline to the east. A second excavation (approximately 40' to the east) was opened up in order to define the lateral extent of the internal corrosion (to east). A cut out was examined from the area of the flowline failure. The failed pipe cutout sample had been removed from location/ taken to BP office. Internal corrosion pitting was also observed in cutout. Localized corrosion pitting appears to be caused by MIC (Anaerobic Bacteria) and/ or CO2 (Based on experience/ BP lab analysis, if conducted, will confirm). No significant scale or sludge deposits were observed in the flowline. Under deposit corrosion was not observed. SW Field Inspector assumes other areas along produced water flowline (and adjacent to this area of flowline) have areas of active localized/ pitting corrosion. BP work/ investigation remains in progress.	maclarej	09/16/2015
As stated on the previous EI field inspection doc #674900752 conducted on 08/31/2015: On August 31, 2015 COGCC SW EPS Jim Hughes conducted an environmental field inspection of a produced water release from a BP flow line. This release was reported to COGCC verbally on 8/31/15 and spill report #400893645 was submitted on 9/1/15. This spill/release point ID is 443095. Andy Hawk, BP representative, was on site and collected fluid samples for analysis. Landowner reported release to BP Hotline on 8/31/15 at approximately 11:00 AM. The line was shut in and depressurized to stop the release. The flow line reportedly carries water from the Florida injection well to the Simon injection well. The cause of the release from the 6" flow line is under investigation. The One Call had been made in preparation of excavating the damaged flow line at the time of this inspection. Release flowed into a pasture to the south where it flowed south-south west through a natural depression. A ditch to the south east of the release point was noted as having a leak which flowed into the same pasture. This water flows into the same natural depression. A sample of the produced water was taken at the release point by BP personnel. A sample of the irrigation waste water was collected near a culvert at the south end of the pasture. Both samples were taken to Green Analytical Laboratory in Durango, CO.	maclarej	09/16/2015

Attached Documents

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

Document Num	Description	URL
674602269	Flowline Integrity Field Inspetion Photos_BP	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3682266
674602270	NOAV 200437191	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3682267