

**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:

09/24/2019

Submitted Date:

09/27/2019

Document Number:

690101420

**FIELD INSPECTION FORM**
 Loc ID 450354 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:**

3 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
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Lara Mesa, Susana		SLaraMesa@kpk.com	
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**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:**

Engineering integrity inspection performed on 9/24/2019; Joint field inspection with COGCC EPS Chris Canfield (also see ENV Inspection Doc #688500162). Details of Corrective Actions identified during this (EG) field inspection are located in the flowline section of this report. Photo Log uploaded.

**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
<u>Flowline Description</u>		
Flowline Type:	Size:	Material:
Variance:	Age:	Contents:
<u>Integrity Summary</u>		
Failures:	Spills:	Repairs Made:
Coatings:	H2S:	Cathodic Protection:
<u>Pressure Testing</u>		
Witnessed:	Test Result:	Charted:
<u>COGCC Rules(check all that apply)</u>		

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

Comment: 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).

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; 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
ANY CORRECTIVE ACTION(S) FROM PREVIOUS INSPECTIONS THAT HAVE NOT BEEN ADDRESSED ARE STILL APPLICABLE (Including ENV FIR Doc #688500162 dated 09/19/2019.	maclarej	09/27/2019

**Attached Documents**

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

Document Num	Description	URL
690101430	Photo Log	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4949283">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4949283</a>