

**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:

11/12/2019

Submitted Date:

11/15/2019

Document Number:

690101507**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: 1675 BROADWAY, STE 2800City: 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 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
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**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
469095	SPILL OR RELEASE	AC	11/08/2019		-	Facility #8 Consolidation Line	EG

**General Comment:**

COGCC Engineering Integrity Inspection completed on 11/12/2019 in response to initial form 19 spill report Doc #402234417 received on 11/08/2019 that outlines the following: On November 7, 2019, at 11:00 am land owner notified KPK about a potential flowline leak. KPK immediately shut-in flowline (Facility #8 Consolidated Line) same day. KPK is actively working on solution to mobilized equipment to the release location to contain and begin recovering released product. Release location located in a drainage collection location making it difficult access with heavy equipment.

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

**Inspected Facilities**

Facility ID: 469095 Type: SPILL OR 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: 10" Material: Carbon Steel  
 Variance: No Age: 20+ Yrs Contents: Multiphase

Integrity Summary

Failures: Damage/Defects Spills: Yes Repairs Made:  
 Coatings: Yes External H2S: No Cathodic Protection: No

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 the following dates: 11/12 & 11/14/19. KPK personnel were on site responding to the spill and removing impacted soils in the area of the release. Excavation work (11/14) at spill Id #469095 exposed (2) flowlines; (1) 10" OD Carbon Steel (Facility #8) consolidation line and (1) 2" carbon steel gas supply flowline. The failure resulting in the spill was not identified; however, it is thought to be at/ near a historical repair where the 10" line transitions to 3" HDPE (poly) material. The KPK crew excavated a second bellhole approximately 425' south of the excavation at the area of release. The 10" carbon steel line was cut at this excavation in preparation for repairs. KPK personnel are scheduled to sting (slipline) approximately 425' of rolled 3" SRD 11 HDPE pipe material (w tracer wire) inside the failed 10" consolidation line. Cut ends to be connected using carbon steel to poly (HDPE) transitions. Spill response, excavation and remediation activities remain in progress. Groundwater observed in excavation.

Corrective Action: Email information outlined below to COGCC Inspector and update CA section of supplemental form 19 spill report to include the following (pertaining to compliance of COGCC series 1100 flowline regulations):  
 1) Root cause of failure resulting in this release (operator determination)  
 2) Measures taken to prevent the problem from reoccurring  
 3) Written description of repairs completed (at spill ID #469095)  
 4) Post repair pressure testing to be witnessed by COGCC staff. Contact COGCC Inspector regarding upcoming scheduling of pressure testing; flowline pressure testing to be charted; satisfactory pressure test shall be completed by the operator prior to returning Facility 8 consolidation flowline to service.

Date: 12/16/2019

**COGCC Comments**

Comment	User	Date
Note: COGCC Inspector spoke with KPK supervisor (Jeff Peterson) on 11/15/19 regarding scheduled repairs to be completed. Per conversation, production volumes into this consolidation pipeline have dropped significantly over the years. The 10" pipeline has been reduced to 3" HDPE at other areas along the line between producing wells and Facility #8. The reduced capacity of the pipeline has not caused a substantial increase in operating pressure that may present an integrity concern.	maclarej	11/15/2019

**Attached Documents**

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

Document Num	Description	URL
402241040	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4990217">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4990217</a>
690101521	Photo Log	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4990207">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4990207</a>