

**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:

12/05/2019

Submitted Date:

12/20/2019

Document Number:

690101562**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:4 Number of Comments0 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
Canfield, Chris		chris.canfield@state.co.us	
		cogcc@kpk.com	
Knop, Max		MKnop@kpk.com	
Schlagenhauf, Mark		mark.schlagenhauf@state.co.us	

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:

Followup COGCC (EG) Field Inspection; Off location flowline pressure testing witnessed. The Corrective Actions outlined on COGCC FIR Doc #690101507 dated 11/12/2019 have been completed by the operator. Location photos and flowline pressure testing data have been uploaded and can be accessed via link(s) at end of report.

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: External Corrosion Spills: Yes Repairs Made: Yes
 Coatings: Yes External H2S: No Cathodic Protection: No

Pressure Testing

Witnessed: Yes Test Result: Pass Charted: Yes

COGCC Rules(check all that apply)

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

Comment: Post repair pressure testing witnessed on 12/5/19. Pressure test (using commingled produced fluids/ gas) was run for (1) hour; starting pressure recorded at 38 psi, ending pressure recorded at 38 psi. The test was charted (paper chart/ attached) by KPK personnel. The test recorded no pressure loss or deviation and adequate stabilization. Communication between endpoints was confirmed at the end of the test by releasing pressure at the Facility #8 valve can located approximately 3650' northwest of the test point tie in and observing a pressure change on the chart. The consolidation flowline repair was completed approximately 2450' NW of the test point. This test witnessed is deemed passing/ satisfactory per COGCC rule 1104.h.

Explanation pertaining to Corrective Actions identified on FIR Doc #690101507 received via email from operator (Max Knop) on 12/18/2019; Corrective Action responses are as follows: Corrosion is the root cause of failure on the 10" carbon steel line. The existing consolidation flowline was stung with ~450 ft of 3" poly pipe with tracer wire. New 3" poly pipe was fused to the existing poly pipe in place from previous flowline repair activities.

Corrective Action:

Date:

COGCC Comments

Comment	User	Date
As outlined on the initial COGCC EG FIR Doc #690101507:	maclarej	12/19/2019
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.		

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	12/19/2019	
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Attached Documents

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

Document Num	Description	URL
690101604	Repair completed; 3" HDPE to 10" CS transition	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5019023
690101605	Pressure test being recorded at valve assembly	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5019024
690101606	Facility 8 consolidation flowline pressure test chart	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5019025