

FORM
INSPRev
X/15State of Colorado
Oil and Gas Conservation Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109

Inspection Date:

07/27/2020

Submitted Date:

07/28/2020

Document Number:

690101988

FIELD INSPECTION FORM

 Loc ID _____ Inspector Name: _____ On-Site Inspection
 _____ Maclaren, Joe _____ 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:

- 2 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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		cogcc@kpk.com	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
477252	SPILL OR RELEASE	AC	07/27/2020		-	UPRR 43 PAN AM G Consolidation	EG

General Comment:

Engineering Integrity Inspection performed on July 27th, 2020 in response to initial form 19 spill report Doc #402445625 received by COGCC on 07/17/2020 that outlines: While in the process of upgrading the consolidation pipe from carbon steel to high density polyurethane pipe, historical contamination was discovered at the location where stung sections of pipe were to be fused together. Excavation work which uncovered the historical contamination has continued with removing impacted soil.

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

Inspected Facilities

Facility ID: 477252 Type: SPILL OR API Number: - Status: AC Insp. Status: EG

Flowline

#1	Type: Non-Well Site	2 of Lines
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Flowline Description

Flowline Type: <u>Non-Well Site</u>	Size: <u>6"</u>	Material: <u>Poly</u>
Variance: <u>No</u>	Age: <u>15-20 Yrs</u>	Contents: <u>Crude Oil</u>

Integrity Summary

Failures: <u>Welds</u>	Spills: <u>Yes</u>	Repairs Made: <u>Yes</u>
Coatings:	H2S: <u>No</u>	Cathodic Protection:

Pressure Testing

Witnessed:	Test Result:	Charted:
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COGCC Rules(check all that apply)

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

Comment: COGCC Inspector spoke with KPK field personnel on site on 7/27/20. Flowline work was recently completed on the 6" HDPE Facility 7 off location/ consolidation flowline. Approximately 250' of new HDPE pipe has been stung/ slip lined in existing OOS 10" CS pipe from an open excavation (spill ID #477252, 40.016400, -104.906815) in a W-NW direction to a valve can located on an adjacent property. The new flowline segment was tied in to existing 6" HDPE flowline pipe (via poly fusion butt end welding) aligned in a E-SE direction that runs toward the intersection of WCR's 17/ 4. During the installation of the new flowline segment, a leaking poly fusion weld was identified along with associated historical impacts to soils/ waters of the state. The failed poly fusion weld has been cut out and repaired. In addition, an out of service 2" CS flowline was observed cut and exposed in the excavation; based on communications with KPK personnel on site the cut/ open ends are scheduled to be capped/ sealed per COGCC rule 1105.e.4. KPK is in the process of excavating and removing impacted soils in the area of the release.

<u>Corrective Action:</u> Update CA section of supplemental form 19 spill report to include the following information pertaining to compliance of COGCC series 1100 flowline regulations: 1) Root cause of flowline failure(s) resulting in this release (final determination). 2) Measures taken to prevent a recurrence. 3) Detailed written description of all flowline repair, replacement and abandonment work completed (at spill ID #477252). 4) Contact COGCC Inspector with schedule of post repair pressure testing; Provide pressure testing charts for all (active) flowline(s) repaired; (See rule 1102.O).	<u>Date:</u> <u>09/01/2020</u>
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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
402454775	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5212400
690101989	View of excavation; flowlines exposed	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5212395
690101990	View W-NW from excavation to valve can	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5212396
690101991	View of excavation/ remediation area (looking S)	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5212397