

State of Colorado
Oil and Gas Conservation Commission

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402472476
Date Issued:
08/20/2020
Date Resolved:

NOTICE OF ALLEGED VIOLATION - ISSUED

Per Rule 522, the Director has reasonable cause to believe that a violation of the Act, or of any Commission rule, order, or permit has occurred, the Director will require the operator to remedy the violation and may commence an enforcement action seeking penalties by issuing a Notice of Alleged Violation (NOAV). Per Rule 523, an operator who violates the Act, or a Commission rule, order, or permit may be subject to a penalty imposed by Commission order.

OPERATOR INFORMATION

OGCC Operator Number: 10000
Name of Operator: BP AMERICA PRODUCTION COMPANY
Address: 1199 MAIN AVENUE SUITE 101
City: DURANGO State: CO Zip: 81301
Contact Name and Telephone:
Name: PATRICIA CAMPBELL
Phone: (970) 712-5997 Fax: ()
Email: patti.campbell@bpx.com

Well Location, or Facility Information (if applicable):

API Number: 05- - -00 Facility or Location ID: 215294
Name: HUBERT MORRISON A Number: 1
QtrQtr: SWNE Sec: 17 Twp: 34N Range: 6W Meridian: N
County: LA PLATA

ALLEGED VIOLATION

Rule: 1102
Rule Description: Operations, Maintenance, and Repair
Initial Discovery Date: 06/03/2020 Was this violation self-reported by the operator? Yes
Date of Violation: 06/03/2020 Approximate Time of Violation: _____
Was this a discrete violation of obvious duration? Unknown
Description of Alleged Violation:

Pursuant to Rule 1102.c; BP America Production Company ("Operator") shall ensure that each component of a flowline or crude oil transfer line must be designed to: (1) Prevent failure by minimizing internal or external corrosion and the effects of transported fluids; (2) Withstand maximum anticipated operating pressures and other internal loadings without impairment; (3) Withstand anticipated external pressures and loads that will be imposed on the pipe after installation; (4) Allow for line maintenance, periodic line cleaning, and integrity testing; and (5) Have adequate controls and protective equipment to prevent it from operating above the maximum operating pressure.

On June 3, 2020 approximately 63 barrels (bbl.) of produced water was released from an internally corroded section of pipe (email from Operator, July 20, 2020) in a gas gathering pipeline system. The produced water flowed off the Hubert Morrison A #1 location (Location ID #325723) and into an irrigation channel that was flowing at the time.

Operator did not ensure that each component of a flowline or crude oil transfer line was designed to prevent failure by minimizing internal corrosion, violating Rule 1102.c.

Abatement or Corrective Action Required to be Performed by Operator: _____ Corrective Action Due Date: 08/30/2020

Proper and timely abatement does not preclude the assessment of penalties and an Order Finding Violation.

The operator shall submit any information that is available concerning failure analysis, integrity/pressure testing, and any data concerning the root causes of the spill. Provide all pipeline integrity data to the COGCC Western Integrity Inspector, Richard Murray, at (970) 989-3092 or g.richard.murray@state.co.us.

Rule: 324A.a

Rule Description: General Environmental Protection

Initial Discovery Date: 06/03/2020

Was this violation self-reported by the operator? Yes

Date of Violation: 06/03/2020

Approximate Time of Violation:

Was this a discrete violation of obvious duration? Unknown

Description of Alleged Violation:

Pursuant to Rule 324A.a; BP America Production Company ("Operator") shall take precautions to prevent significant adverse environmental impacts to air, water, soil, or biological resources to the extent necessary to protect public health, safety and welfare, including the environment and wildlife resources, taking into consideration cost-effectiveness and technical feasibility to prevent the unauthorized discharge or disposal of oil, gas, E&P waste, chemical substances, trash, discarded equipment or other oil field waste.

On June 3, 2020 a release of produced water was reported by the operator. Approximately 63 bbls. of produced water was released from an internally corroded section of pipe (email from Operator, July 20, 2020) in a gas gathering pipeline system. The E&P waste flowed off of the Hubert Morrison A #1 location and into an irrigation channel that was flowing at the time. The outfall of the channel flowed across a field and into another irrigation channel which flowed through a culvert underneath the access road. This channel led to another field which was being flood irrigated on June 5, 2020 during an environmental inspection conducted by COGCC SW EPS.

Operator failed to take precautions to prevent internal corrosion of a section of pipe in a gas gathering pipeline system leading to a spill and causing significant adverse environmental impacts, violating Rule 324A.a.

Abatement or Corrective Action Required to be Performed by Operator:

Corrective Action Due Date: 08/30/2020

Proper and timely abatement does not preclude the assessment of penalties and an Order Finding Violation.

The operator shall submit any information that is available concerning failure analysis, integrity/pressure testing, and any data concerning the root causes of the spill. Provide all pipeline integrity data to the COGCC Western Integrity Inspector, Richard Murray, at (970) 989-3092 or g.richard.murray@state.co.us.

PENALTY

Penalties for violations alleged in this NOAV will be calculated pursuant to Rule 523, with daily penalties accruing pursuant to Section 34-60-121(1), C.R.S.

ANSWER

Pursuant to Rule 522.d.(2), the operator must file an Answer to this NOAV within 28 days of its receipt, or a default judgement may be entered. Hard copy answers are filed with the Commission Secretary at the Commission's Denver office and should also be emailed to dnr_cogccenforcement@state.co.us.

NOAV ISSUED

NOAV Issue Date: 08/20/2020

COGCC Representative Signature:

COGCC Representative: Trent Lindley

Title: NOAV Specialist

Email: trent.lindley@state.co.us

Phone Num: (303) 894-2100x5143

CORRECTIVE ACTION COMPLETED

Rule: 1102

Rule Description: Operations, Maintenance, and Repair

Corrective Action Start Date: _____ Corrective Action Complete Date: _____

Has corrective action for this violation been performed as required? _____

Description of Actual Corrective Action Performed by Operator

Rule: 324A.a

Rule Description: General Environmental Protection

Corrective Action Start Date: _____ Corrective Action Complete Date: _____

Has corrective action for this violation been performed as required? _____

Description of Actual Corrective Action Performed by Operator

FINAL RESOLUTION

Cause #: _____ Order #: _____ Docket #: _____

Enforcement Action: _____ Final Resolution Date: _____

Final Resolution Comments:

ATTACHMENT LIST

View Attachments in Imaged Documents on COGCC website (<http://ogccweblink.state.co.us/>) - Search by Document Number.

<u>Document Number</u>	<u>Description</u>
402472481	NOAV ISSUED
402472482	NOAV CERTIFIED MAIL RECEIPT

Total Attach: 2 Files