

**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:

09/23/2020

Submitted Date:

09/24/2020

Document Number:

689501092

FIELD INSPECTION FORMLoc ID _____ Inspector Name: _____ On-Site Inspection ☐
Oakman, Kari 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:

4 Number of Comments

2 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
MacLaren, Joe		joe.maclaren@state.co.us	
Leonard, Mike		mike.leonard@state.co.us	
Ferrin, Jeremy		jeremy.ferrin@state.co.us	
Graber, Nikki		nikki.graber@state.co.us	
, KPK		cogcc@kpk.com	All Inspections
Axelson, John		john.axelson@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
478086	SPILL OR RELEASE	AC	09/22/2020		-	UPRR 43 PAN AM G Consolidation #2	EI

General Comment:

On Wednesday September 23, 2020 at approximately 14:00, COGCC environmental protection specialists (EPS), Kari Oakman and Nikki Graber, inspected the UPRR 43 Pan Am G Consolidation #2 flowline release in response to Spill/Release Report Document# 402493419 (Spill/Release Point ID #478086) discovered by the surface owner on 9/19/20 and reported to COGCC by the Operator on 9/20/2020. Joe MacLaren, COGCC flowline integrity inspector, was on location upon arrival by EPS staff also to perform a follow up inspection related to the release. No Operator personnel were on location at the time of COGCC arrival.

Two separate excavations were opened to expose the flowline. The excavation to the south of the county road (CR 4) appeared to have no environmental impacts and was an access for repairs. Hydrocarbon impacted material was present in the northern excavation (the reported site of the spill). Both excavations were open and were absent of any fencing to prevent access by people or wildlife. Hydrocarbon impacted material was stored adjacent to the northern excavation without any best management practices (BMP's) or other control devices (photo 1). A residence is located approximately 200' north of the northern excavation and Big Dry Creek is approximately 400' northeast with riparian habitat approximately 50' northeast.

Upon approaching the edge of the northern excavation, COGCC personnel heard a hissing noise and observed gas releasing from a hole in the flowline as well as pooled liquid hydrocarbons beneath the line (see video attachment). Personal four gas monitors did not indicate hazardous atmosphere; however, COGCC personnel evacuated the location by moving approximately 400' upwind and called the Operator to inform them that the line was not properly isolated.

At approximately 14:20 Operator personnel arrived on location and approached the southern excavation with equipment for repairs. As COGCC personnel were approaching the team to stop the work the landowner arrived on location and additional Operator personnel arrived. Kari Oakman and Joe MacLaren spoke with the landowner. Nikki Graber requested that the operator personnel who had approached the southern excavation (which did not show any indication that the line had been properly isolated) stop work due imminent health and safety hazards. Operator personnel investigated the cause of the failed isolation and determined that an isolation valve was not functioning properly. COGCC staff instructed Operator to file a Form 22 Accident Report for the near miss (Submitted 9/23/2020, Doc#402496504) and a Form 44 Flowline Report for a Grade 1 Gas Leak (not submitted at the time of this inspection report).

After discussing the incident with the landowners Kari Oakman and Nikki Graber left the location while Joe MacLaren remained to witness repairs. According to Joe MacLaren and the Form 22 submitted by Operator, a vac truck was brought in to depressurize the line which temporarily halted the gas release at approximately 15:45. As of 12:00 on 9/24/2020 (inspection submittal) the Operator has only reported temporary depressurization; the line has not been reported as repaired or permanently isolated.

Environmental**Spills/Releases:**

Type of Spill: _____ Estimated Spill Volume: _____

Comment: At the time of inspection a limited shallow excavation had occurred and the pipeline was exposed. Pooled hydrocarbons were observed beneath the line.Corrective Action: In accordance with Rule 906.a, Operator shall immediately cleanup and remove any pooled hydrocarbons. Per Rule 906.b., the Operator shall submit a supplemental Form 19 not more than 10 calendar days after the spill/release is discovered (9/29/2020). On the supplemental Form 19 operator is to provide the root cause of the incident and preventative measures that will be taken to prevent reoccurrence. Please give the location of the failure (i.e. 6 O'clock position) and if the root cause is corrosion explain if it is external or internal. Operator will provide confirmation soil sample analytical data that verifies compliance with Table 910-1. Operator shall also collect surface water samples from Big Dry Creek (upstream, downstream, and at location of spill). Operator shall sample the private water well located ~ 350ft north of the spill location (DWR Permit 302477). Include sample location diagram summary table of analytical results compared to table 910-1 standards, analytical lab report, disposal manifests and gate tickets via supplemental Form 19 no later than 45 days from the Spill Report Date (11/3/2020).Date: 09/24/2020

Reportable: _____ GPS: Lat _____ Long _____

Proximity to Surface Water: _____ Depth to Ground Water: _____

Water Well Complaint:

DWR Receipt Num: _____ Owner Name: _____ GPS : _____ Lat _____ Long _____

Field Parameters:

Sample Location: _____ Comment: _____

Waste Management:

Type Management Condition GPS (Lat) (Long)

Oily Soil Piles Inadequate _____

Comment: Oily waste is stored onsite without any BMPs to contain runoff. Sensitive receptors (county road, residence, Big Dry Creek) are present on all sides of the spill location (see photo 1).Corrective Action: Immediately install BMPs or remove oily waste from location.Date: 09/24/2020**Spill/Remediation:**

Comment: _____

Corrective Action: _____ Date: _____

Emission Control Burner (ECB): _____

Comment: _____

Pilot: _____ Wildlife Protection Devices (fired vessels): _____

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

Document Num	Description	URL
689501093	Video - Line Leak	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5254885
689501094	Photo 1 - Soil Pile	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5254886