

**FORM
INSP**Rev
X/20**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:

07/28/2022

Submitted Date:

08/08/2022

Document Number:

690103138**FIELD INSPECTION FORM**Loc ID 159787 Inspector Name: Maclaren, Joe On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**OGCC Operator Number: 46290Name of Operator: KP KAUFFMAN COMPANY INCAddress: 1700 LINCOLN ST STE 4550City: DENVER State: CO Zip: 80203**Status Summary:**

- ☐ THIS IS A FOLLOW UP INSPECTION
- ☐ FOLLOW UP INSPECTION REQUIRED
- ☐ NO FOLLOW UP INSPECTION REQUIRED

Findings:2 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
Gorka, Ray		RGorka@kpk.com	
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Graber, Nikki		nikki.graber@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
482628	SPILL OR RELEASE	AC	08/03/2022		-	AJ #1 Consolidation Line	EG

General Comment:

COGCC Engineering Integrity Inspection performed on July 29th 2022 in response to initial form 19 spill report Doc #403115095 received on 08/01/2021 that outlines: On July 22, 2022 KPK operators were conducting InfraRed (IR) camera inspections and discovered evidence of a release along the AJ #1 Natural Gas consolidation line. KPK crews immediately shut in the line and attached a Vac Truck to remove all remaining natural gas within the consolidation line. Upon completion of the shut in and removal process, IR cameras were utilized to determine that the source has been removed.

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

Inspected Facilities

Facility ID: 482628 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: Age: Contents:

Integrity Summary

Failures: Spills: Repairs Made:
 Coatings: H2S: Cathodic Protection:

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 07/26/21 & 07/28/22; COGCC Integrity Inspector met with KPK personnel. A failure of the 10" carbon steel (AJ #1/ Firecracker) consolidation flowline resulted in the release (at approximately 40.059530, -104.945780). The cause of the failure is unknown at this time; excavation in the area of the spill not initiated. KPK is in the process of completing repairs to the 10" flowline. (2) bellhole excavations were observed exposing the 10" flowline; (1) north of the release point at approx 40.060662, -104.945780 and (1) south of the release point at approx 40.058683, -104.945780. The 10" OLF has been cut in both excavations; an estimated 800' linear feet of 4" OD DR 11 HDPE pipe has been stung/ slip lined inside the existing 10" carbon steel line from bellhole to bellhole, inside the pipe across the point of failure/ release. Cut ends have been re-connected using carbon steel to poly (HDPE) transitions. Tracer wire has been installed. Also, (1) 2" CS off location gas flowline (OOS) was observed in the bellhole excavations (open cut ends to be capped). Spill response, excavation and remediation activities are currently in progress.

Corrective Action: Document information outlined below on the CA section of COGCC supplemental form 19 spill report to include the following (compliance of COGCC series 1100 flowline rules):
 1) Outline root cause of failure resulting in spill (1104.k. Integrity Failure Investigation/ Operator Determination)
 2) Measures taken to prevent a recurrence of failure (1102.I Corrosion Control/ 1104. Integrity Management)
 3) Description of flowline repair work completed (1102.j. Repair)
 4) Confirm integrity of flowline repairs/ reconnections (via pressure testing) prior to returning flowline to service (1102.j.4 and 1102.O)
 5) Ensure flowline(s) are isolated and depressurized; associated wells and isolation valves are SI/ OOSLAT to prevent unintentional release per 1102.j.7 (ASAP/ prior to and during time of repair).
 6) Historically abandoned/ out of service flowlines exposed in the excavation must be abandoned per COGCC rule 1105 (ends sealed per 1105.e.4).

Date: 09/08/2022

Attached Documents

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

Document Num	Description	URL
690103144	Photo Log	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5823319