

**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:

02/15/2024

Submitted Date:

02/20/2024

Document Number:

705000630**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: 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
		cogcc@kpk.com	
Peterson, John		jpeter@kpk.com	
Wheeler, Steven		steven.wheeler@state.co.us	
Schlagenhauf, Mark		mark.schlagenhauf@state.co.us	
Graber, Nikki		nikki.graber@state.co.us	
Brown, Kari		kari.oakman@state.co.us	
Anderson, Laurel		laurel.anderson@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
479608	Flowline System	AC	03/12/2021		-	Facility 4 Consolidation	EG

General Comment:

ECMC Engineering Integrity Inspection performed on February 15th, 2024 in response to initial form 19 spill report Doc #403667163 received on 01/26/2024 that outlines: KPK had a spill (ID 485898) on 1/19/2024. On 1/23/24, KPK had repaired the leaking line and was performing a pressure test and found that the flowline would not pressure up. KPK immediately began walking the line to identify any leak points causing the pressure failure. This spill reported on 1/25/2024 was identified on the same flowline approximately 3300 feet east of the 485898 spill. KPK's pumper immediately went to the site, shut in the wellheads, and isolated the flowline. KPK mobilized a vac truck to evacuate the flowline. A soil berm was created surrounding the spill, and booms and snow fence were placed around the spill. The surface staining was approximately 8 square feet (2'x4').

Corrective actions/ information to be submitted is outlined in the flowline section of report. Photo log is uploaded.

Inspected Facilities

Facility ID: 479608 Type: Flowline 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: 3" Material: Poly
Variance: Age: Contents: Multiphase

Integrity Summary

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

Pressure Testing

Witnessed: Yes Test Result: Charted:

COGCC Rules(check all that apply)

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

Comment:

ECMC Integrity Inspector along with KPK personnel were on location on 02/15/2024. A fenced excavation (measuring approx 25' x 40') was observed approximately 20' south of the reported spill located @ 40.093323, -104.935819. (1) 6" carbon steel flowline pipe (and isolation valve); (2) new 3" SDR 11 HDPE off location flowlines; (1) 2" CS natural gas and (1) 10" CS consolidation lines were exposed in the excavation. The new HDPE flowlines were recently installed as part of the repair/ pipe replacement section completed at spill id #485940. A total of approximately 1000 linear feet of new 3" HDPE flowline pipe has been installed (via slip lining through existing 6" CS pipe/ connected to (1) Facility 4 flowline cut end via transitional fitting); from the excavation adjacent to release and south approx 700' to a fenced excavation located at approx 40.092037, -104.924324; and west approx 300' to a fenced excavation at 40.093911, -104.925341. Both endpoints connect/ tie in to existing 3" HDPE Facility 4 system flowlines. The failure of the flowline pipe (6" CS/ Facility 4) resulting in the spill was not seen (not excavated/ exposed); the root cause is unknown at this time. Excavation and remediation activities are in progress.

Post repair flowline pressure testing was witnessed at the time of this field inspection. The repair segments detailed above were part of integrity testing. The results of testing will be reviewed by ECMC engineering integrity team upon submittal of chart/ testing data and other misc information from operator.

Corrective Action: Document information requested below in the CA section of ECMC 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 (details/ specifics)
(1104.k. Integrity Failure Investigation/Operator Determination)
2) Measures taken to prevent a recurrence of failure (1104. Integrity Management)
3) Detailed description of flowline repair work completed (1102.j. Repair)
4) Confirm integrity of flowline repairs/ reconnections (via pressure testing/ upload chart with test date) prior to returning flowline(s) to service (1102.j.4 and 1102.O)
*use form 27 to document information if form 19 is closed

Date: 03/05/2024

Attached Documents

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

Document Num	Description	URL
705000632	Photo Log	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6435869