

**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:

08/22/2024

Submitted Date:

08/30/2024

Document Number:

717300015**FIELD INSPECTION FORM**Loc ID _____ Inspector Name: _____ On-Site Inspection ☐
Maclaren, Joe 2A Doc Num: _____**Operator Information:**ECMC 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:4 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
Schlagenhauf, Mark		mark.schlagenhauf@state.co.us	
Wheeler, Steven		steven.wheeler@state.co.us	
		cogcc@kpk.com	
Brown, Kari		kari.oakman@state.co.us	
Peterson, John		jpeterson@kpk.com	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
475986	OFF-LOCATION FLOWLINE	AC	02/05/2021		-	Wellhead Line	EG

General Comment:

ECMC Engineering Integrity Inspection performed on August 22nd, 2024 in response to initial form 19 spill report Doc #403897427 received on 08/22/2024 that outlines: A KPK employee found contaminated soil at the ground surface and notified supervisors of the release. Personnel immediately shut in wells and a crew was sent to perform source removal.

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

Inspected Facilities

Facility ID: 475986 Type: OFF- API Number: - Status: AC Insp. Status: EG

The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12

ECMC Comments

Comment	User	Date
<p>ECMC Integrity Inspector on location on 08/22/2024 and 08/26/2024. An open excavation (measuring approx 20' x 40') was observed between the wellhead and tank battery @ 40.101818, -104.967656. (1) 3" diameter fiberglass flowline (servicing the Lanson Farms 15) was observed exposed in the excavation; the flowline transitions from 3" fiberglass to 3" carbon steel in the excavation and enters 6" casing pipe used to cross an irrigation ditch east of the excavation on route to the Lanson Farms Tank Battery. The flowline pipe failure was observed; the cause of failure appears to be the result of external corrosion of the 3" CS pipe (inadequate external coating) near the entry point of the casing pipe. Approximately 20 linear feet of flowline pipe was cut out and replaced with 3" fiberglass pipe material. The west end of the pipe replacement section is joined to existing fiberglass pipe via glue coupler; the east end of the replacement section transitions from fiberglass pipe to carbon steel pipe via carbon steel collar and threaded transitional fittings (carbon steel fittings tape wrapped). The excavation is full of ground water; the repaired section of exposed flowline is currently under water. Note: It is unknown if the cut end of the 6" casing pipe was re-sealed to prevent groundwater entry; only a black tape wrap was observed as a means of sealing/ preventing water entry into casing pipe. The well was observed shut in at the time of inspection; No OOSLAT was observed at wellhead or inlet to the flowline manifold at facility/ battery. Excavation/ remediation work is in progress.</p> <p>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):</p> <ol style="list-style-type: none"> 1) Outline root cause of failure resulting in spill (additional details/ updated information) (1104.k. Integrity Failure Investigation/Operator Determination) 2) Measures taken to prevent a recurrence of failure (1102.I Corrosion Control/ 1104. Integrity Management); to include summary of how a future corrosion failure of carbon steel pipe/ fittings will be prevented at entry and inside the 6" casing pipe 3) Description of flowline repair work completed; provide documentation of all transitional fittings used to confirm they meet industry standards for this type of repair (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); Outline testing procedure (to include test pressure to be used) for review by ECMC Engineering Integrity Unit 5) Ensure flowline(s) are isolated and depressurized; wells and isolation valves are SI/ OOSLAT to prevent unintentional release per 1102.j.7 (during shut in for flowline repair and remediation work) <p>CA Due Date 09/09/2024</p>	maclarej	08/30/2024
<p>As outlined in the CA section of ECMC Form 19 Doc #403897427 received on 08/22/2024: The root cause was a joint failure at the point where the flowline transitions from fiberglass to steel.</p> <p>KPK is systematically replacing steel and fiberglass flowlines with poly pipe to eliminate future corrosion of the flowline and minimize pipe joints throughout the field. Poly pipe does not corrode and is compatible with the materials KPK produces. KPK plans to replace the flowline with poly pipe.</p> <p>*Note: Written information submitted by operator (shown above) is inaccurate/ incomplete and requires updating. See corrective actions outlined above.</p>	maclarej	08/30/2024

Attached Documents

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

Document Num	Description	URL
717300016	Photo Log	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6688919