

**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:

03/26/2024

Submitted Date:

03/29/2024

Document Number:

705000657**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
Watzman, Ross		rwatzman@kpk.com	
		cogcc@kpk.com	
Anderson, Laurel		laurel.anderson@state.co.us	
Peronard, Paul		Peronard.Paul@epa.gov	
Peterson, John		jpeter@kpk.com	
Deranleau, Greg		greg.deranleau@state.co.us	
Wheeler, Steven		steven.wheeler@state.co.us	
Schlagenhauf, Mark		mark.schlagenhauf@state.co.us	
Graber, Nikki		nikki.graber@state.co.us	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
478839	Flowline System	AC	12/17/2020		-	Facility 8	EG
486343	SPILL OR RELEASE	AC			-	Facility 8 @ Sebold	EG

**General Comment:**

ECMC Engineering Integrity Inspection performed on March 26th, 2024 in response to initial form 19 spill report Doc #403728240 received on 03/22/2024 that outlines: KPK was notified when Mr. Bosaw (landowner) notified Avi Mehler (VP of Land) and NRC emergency response line about the spill. Jeff Petersen responded to the spill. On arrival, KPK noted the spill had migrated into a dry irrigation ditch ~100 ft away. The ditch is Brighton Ditch, which has not been activated for the season. Avi contacted Donald Smith, Superintendent of Brighton Ditch, informed him of the spill, and requested he not activate the ditch until impacts are removed.

KPK shut in wells, evacuated the line, placed booms in the ditch and immediately began to remove the stained soil. KPK will work from the endpoint of oil migration moving upstream in direction to the entrance point and along the bank. Stained soil has been put on plastic containment liner and contained within a berm. KPK will be collecting soil samples after excavation within the ditch to document that petroleum hydrocarbons have been removed.

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

**Inspected Facilities**Facility ID: 478839 Type: Flowline API Number: - Status: AC Insp. Status: EG**Flowline**

#1	Type:Non-Well Site	of Lines	
----	--------------------	----------	--

Flowline Description

Flowline Type: Non-Well Site Size: 3" Material: Poly  
Variance: Age: Contents: Multiphase

Integrity Summary

Failures: Welds Spills: Yes Repairs Made: No  
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:

ECMC Integrity Inspector on location on 03/22/2024 and 03/26/2024. An open excavation (measuring approx 25' x 50') was observed at the reported spill location @ 40.040416, -104.857951. A second excavation (measuring approx 20' x 40') was observed approximately 20' north of the primary excavation @ 40.04048, -104.857951. Numerous off location flowlines were exposed in the excavations; (1) 8" carbon steel flowline pipe (Facility 8 consolidation/ ID #478839) was observed in both excavations (trending N-S direction); this flowline (currently out of service) has been cut and historically slip-lined with 3" SDR 11 HDPE pipe (historical repair). In addition, (3) 2" CS (OOS) and (1) 4" carbon steel (OOS Ashon Paige/ ID #479607 trends E-W ) flowlines were exposed in the excavations; these flowlines appear to be inactive and historically abandoned in place.

Investigation into the location of the failure point and root cause leading to the spill/ release is in progress. The operator focus has been on the 3" HDPE (poly) flowline (slip-lined pipe) since it is the only "known" potentially active status flowline exposed in the excavations. Per communications with KPK personnel on site (3/26) a pipe failure was identified approximately 50' north of the release point (at the north excavation). Per KPK, the 3" HDPE slip-lined pipe failed inside the 8" CS Facility 8 flowline pipe; a separated/ parted butt-end poly fusion weld was identified. The cause of the failed fusion weld is unknown at this time. The gas/ fluid release inside the casing pipe moved in a south direction and surfaced at the release point outlined above.

Additional Inspection Points:

- ECMC Form 44 information has not been updated by operator to show the newer constructed 3" HDPE flowline replacing the 8" CS flowline listed (Facility 8/ ID #478839).
- The Facility 8 flowline was assumed to be depressurized and shut in (per KPK); the pressure source (gas and fluids) leading to the release is unknown at this time.
- In addition to flowlines/ pipe exposed in both excavations, a suspected buried vessel was found in the south excavation. Per KPK this may have been a historic drip vessel installed to service the Facility 8 consolidation flowline. Per KPK, this vessel is scheduled to be removed during excavation/ remediation work.
- Flowline repair work has not been initiated/ completed at this time.
- Excavation and remediation work is in progress.

Corrective Action:	<p>Document information requested below in the CA section of ECMC supplemental form 19 spill report and provide written documentation to ECMC engineering integrity unit (EIU) via ECMC Form 4 sundry (compliance of ECMC series 1100 rules):</p> <ol style="list-style-type: none"> <li>1) Outline root cause of failure resulting in spill (additional details/ specifics) (1104.k. Integrity Failure Investigation/Operator Determination)</li> <li>2) Measures taken to prevent a recurrence of failure (1104. Integrity Management)</li> <li>3) Description of flowline repair work completed (1102.j. Repair)</li> <li>4) Provide ECMC with current written HDPE fusion welding procedures, training records and quality control measures being used in the field (1102.d. Installation).</li> <li>5) Ensure flowline(s) are isolated and depressurized; wells and isolation valves are SI/ OOSLAT to prevent unintentional release per 1102.j.7 (prior to and during time of repair).</li> <li>6) Historically abandoned/ out of service flowlines exposed in the excavation must be abandoned per ECMC rule 1105 (ends sealed per 1105.e.4).</li> <li>7) Confirm integrity of flowline repairs/ reconnections (via pressure testing/ upload chart with test date) prior to re-pressurizing/ returning flowline(s) to service (1102.j.4/ 1102.O)</li> <li>8) Update ECMC Form 44 off location flowline registration requirements for Facility 8 (ID #478839) (and all other KPK owned flowline facilities) where new flowlines have been constructed to replace out of service off location (consolidation) flowlines. Update GIS information and submit Facility 8 consolidation map to ECMC EIU (1101.b. Off-Location Flowline Registration)</li> </ol> <p>*use form 27 to document information if form 19 is closed; also submit information on ECMC form 4 sundry as outlined above.</p>	Date: <u>04/15/2024</u>							
Facility ID:	<u>486343</u>	Type:	<u>SPILL OR</u>	API Number:	<u>-</u>	Status:	<u>AC</u>	Insp. Status:	<u>EG</u>

**Attached Documents**

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

Document Num	Description	URL
403735966	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6486387">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6486387</a>
705000658	Photo Log	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6486385">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6486385</a>