

Notice to Operators Statewide
Flowlines or Pipelines – 1100 Series Rules – May 16, 2017

Frequently Asked Questions

Introduction

Operators are required to use the attached Flowline Inventory spreadsheet to document their Flowline and pipeline inventory and location data (Phase I) and integrity test data (Phase II) for all Flowlines and pipelines associated with a well or production facility located within 1,000 feet of a Building Unit. The Flowline Inventory spreadsheet has required data fields for both Phase I and Phase II activities. Operators are requested to submit iterations of the Flowline Inventory spreadsheet to COGCC on a weekly basis. Operators may complete all Phase I actions first, then proceed to Phase II, or may complete Phase I and Phase II activities for a given location before moving to the next location. Updates to the Flowline Inventory spreadsheet will be captured automatically by the COGCC database.

Frequently Asked Questions

1. What is meant by the term "tank battery" in Phase I, part 1.a.?

“Tank battery“ is used broadly to denote a Battery, Oil and Gas Facility, Oil and Gas Location or Production Facility.

2. Why does the NTO refer to both “pipelines” and “Flowlines”?

The NTO refers to pipelines only because the 1100-Series Rules are called “Pipeline Regulations.” The NTO is limited to conduits that meet the COGCC 100-Series Rules definition of “Flowlines,” regardless of the common name associated with such a line.

3. Does this NTO cover midstream gas gathering pipelines?

No. This NTO does not apply to pipelines after custody transfer to gas gathering company pipelines.

4. Does this NTO apply to wells or production facilities on federal surface or federal minerals?

Yes.

5. Does this NTO apply to wells or production facilities on tribal surface or tribal minerals?

No.

Flowline NTO FAQ

6. Does the NTO cover PHMSA regulated lines?

No (unless they are regulated Flowlines).

7. Does the NTO cover gas storage?

Interstate, FERC authority gas storage is not included.
Intrastate gas storage is included.

8. Does the NTO cover Flowlines on Oil and Gas Locations at which all the wells and production facilities are co-located on the same pad?

Yes. However, Locations with remote tank batteries are a higher priority than co-located facilities, and staff recommends operators prioritize integrity testing of Flowlines where the well(s) and production facilities are not co-located on the same well pad.

9. Phase I, subpart 2 refers to removing all operating valves from any existing Flowline or pipeline riser not in use. May lock-out / tag-out be used instead of removing a valve?

Yes. A riser associated with a Flowline or pipeline not in use must be painted with fluorescent paint, then any valves on the riser may be removed, locked-out / tagged-out, or blinded-out / tagged-out as a temporary measure until the riser can be cut-off below grade and sealed pursuant to COGCC Rule 1103.

10. In the Flowline Inventory spreadsheet, do the first 9 columns describe the line's starting point and the next set of columns describe the endpoint of the line?

Yes, in the simple case of a well, separator and tank all on the same location, the first row would report the well to separator using the well's API number followed by the riser type, GPS location and status. In the same row the Flowline end point would be described by the Location ID, riser GPS location and status. Then a new row is used to describe the separator-to-tank connection. The starting point to the separator outlet with the riser type, GPS location and status. The API number is repeated to complete the row. Then the endpoint is at the tank with Location ID, riser GPS location and status. This process is repeated for all lines. When the well's API location and the Facility Location ID are not co-located, the various scenarios will become apparent, with the well, separator or tanks at different locations.

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11. How will wells scheduled for P&A (Form 6, Intent to be Abandoned submitted) be handled?

Mark risers with fluorescent paint, lock-out/tag-out or blind plug / tag-out risers and provide a comment on the spreadsheet noting a Form 6 has been submitted for the well and related piping.

12. What accuracy is required for GPS locations?

A PDOP of less than 6 is required. For newer GPS receivers (e.g. GNSS), an accuracy statement of 1 meter or less is also acceptable (please record these values in meters in the PDOP column and note in comments that accuracy values are being reported).

13. May operators use in-house personnel to collect GPS locations?

Yes, subject to the GPS accuracy requirements stated above.

14. Does COGCC have enough GPS devices with the required accuracy to "loan" them to small operators?

No, COGCC does not have units to loan. Suitable GPC units are available for rent from various companies. Well-known brand names include Trimble and Corvallis.

15. Do Flowlines that have an open end going to a tank or water pit need to be tested for integrity?

If the dump line is on the well pad or on the facility location, an operator will need to add the line to the Phase I inventory. In Phase II, enter "Dump Line" in the flowline type column. Ultimately an operator will have to obtain isolation equipment or come up with an integrity alternative acceptable to the COGCC

16. Do dump lines need a specific GPS location?

If well, tanks and separation equipment are co-located on the same location, the dump lines do not have to be separately located with the GPS. You may use the API # and Facility ID, which have the same Location ID.

17. Are flowlines associated with shut-in (SI) and temporarily abandoned (TA) wells included under the NTO requirements?

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Yes. SI and TA wells are considered active and must be managed in accordance with existing COGCC rules. If a bridge plug has been set, an outside fluid source can be used to perform integrity testing. Any line not abandoned pursuant to Rule 1103 is considered active.

18. Is the distance from a Building Unit based on the beginning point, end point, or path of a Flowline?

Inventory and integrity testing requirements apply if either end of a Flowline is within 1,000 feet of a Building Unit, and if the known pathway of a Flowline passes within 1,000 feet of a Building Unit.

19. Do existing pressure testing variances supersede the NTO?

No. Operators with an existing pressure testing variance must comply with the NTO.

20. If an operator has no flowlines within 1,000 feet of a Building Unit, what is required under the NTO?

Phase II of the NTO applies to all flowlines and risers, regardless of proximity to a Building Unit. An operator may respond to DNR_COGCC_SpecialProject@state.co.us. With specific comments about NTO compliance.

21. Does the NTO only apply to what is considered “higher” risk facilities located within the 1,000’ buffer zone?

No.

Phase I refers to the abandonment of any unused flowline.

Subpart 1 requires the reporting of any flowlines within 1,000 feet of a Building Unit.

Subpart 2 requires for all piping the identification of any unused risers.

Phase II refers to the abandonment of any unused flowline.

Subpart 1: requires operators to ensure and document integrity flowlines within 1,000 feet of a Building Unit.

Subpart 2: requires operators to abandon unused flowlines.

22. Does a current annual pressure testing plan satisfy the NTO requirements?

No. However, a documented integrity test for a Flowline completed after November 1, 2016 satisfies the integrity testing requirement of the NTO.

Flowline NTO FAQ

23. Do ancillary piping that feeds gas to meters and domestic taps need to be inventoried and tested for integrity under the NTO?

Yes. An operator is responsible for these lines and should follow the NTO

24. Are Flowlines associated with a TA well required to be tested for integrity if both ends can be seen and are disconnected?

In this case, either the risers must be marked with fluorescent paint and locked-out / tagged out or blind-plug / tagged out until the risers are cut below grade, or the lines must be inventoried and tested for integrity prior to June 30, 2017.

25. Risers can be found several times on a pad, and the Flowline Inventory spreadsheet has a one chance; do you define the end point for a riser as the outlet side of the meter?

The end point would be the flange on the valve or end of the vertical section.

26. If a well has wildlife protection restrictions is an extension of time available?

No. The work program scheduled under the NTO does not require use of restricted heavy equipment.