



Update: Flowline Notice to Operators

By: [Joby Rittenhouse](#)

At the July 24th COGCC Hearing, Director Matt Lepore provided an update regarding the Flowline Notice to Operators (“NTO”). In the wake of the fatal explosion that occurred in Firestone, Colorado, the COGCC issued the NTO (available [here](#)) consisting of two parts. Phase I required operators to inspect all existing flowlines and pipelines, and to provide location points for flowlines located within 1,000' of a Building Unit. Any existing flowlines or pipeline risers not in use were to be clearly marked and capped pursuant to Phase I requirements. Phase II required operators to perform integrity tests on all flowlines within 1,000' of any Building Unit and to complete abandonment of any flowline or pipeline not actively operated, regardless of distance to a Building Unit. Phase I was to be completed by May 30, 2017, and Phase II, by June 30, 2017.

Since June 30, the COGCC has been reviewing a substantial amount of data submitted pursuant to the NTO to determine not only what to do with the information, but how to provide that information in an accessible and useful form to the public. In his update during the July 24th Commission Hearing, Director Lepore emphasized that the purpose of the NTO was not to create a mapping system of all flowlines in Colorado; rather, the goal was to identify beginning and endpoints and ensure flowline integrity. Nonetheless, Director Lepore indicated that discussion is ongoing within the Department of Natural Resources and Governor’s office regarding the potential need to identify flowline pathways; however, such was not the focus or intent of the COGCC’s NTO.

With regard to information obtained through the NTO, Director Lepore provided the following summary:

- 176 Operators submitted data to the COGCC, regarding:
 - 30,582 Integrity Tests performed
 - 22,963 Wells inspected
 - 128,573 Risers inspected
 - 11,865 Locations
 - 7,568 Flowlines Abandoned

With regard to these figures, Director Lepore commented that the number of operators (with operations within 1,000' of Building Units) that submitted data was higher than estimated. Similarly, the number of wells for which data was provided was also greater than that expected by the Commission. Furthermore, in response to further inquiry from the Commission, Director Lepore indicated that Commission staff accompanied and observed as operators inspected approximately 2,200 wells at 1,241 locations and witnessed 423 flowline integrity tests.

The Commission is now tasked with reviewing and gleaning through this data to reduce it to an accessible format. The ultimate form and platform for this massive data set is currently undetermined, as is whether such information will be hosted by the COGCC (or perhaps another clearinghouse).

As an update regarding the on-going investigation into the Firestone explosion, Director Lepore indicated that the National Travel Safety Board representatives who have been charged with the investigation commenced with fact witness interviews on July 25. Director Lepore stated that the ultimate conclusion of this investigation and final issuance of a report is not expected until June 2018.

Lastly, Director Lepore alluded to likely rulemaking to be undertaken by the Commission in the upcoming year, related not only to flowlines but also orphan wells and distressed operators. For further information regarding the NTO or potential rulemaking, please contact [Jill Fulcher](#) or [Joby Rittenhouse](#).