



COGCC Transitions from Random Selection to Targeted Criteria for 2017 Flowline Audits

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During its February Operator's Meeting, the Colorado Oil and Gas Conservation Commission (COGCC) released the outcome of its first year of flowline audits and highlighted new, targeted criteria for selecting audit locations in 2017. These audits follow the publication of COGCC's May 2015 flowline guidance, updated in January 2017.

Flowlines are broadly defined, by COGCC's Rules, to include "those segments of pipe from the wellhead downstream through the production facilities ending at: in the case of gas lines, the gas metering equipment; or in the case of oil lines the oil loading point or LACT unit; or in the case of water lines, the water loading point, the point of discharge to a pit, the injection wellhead, or the permitted surface water discharge point."

In 2016, COGCC audited flowlines by random selection. In 2017, audit locations will be selected based on the following criteria:

- Population density;
- Proximity to sensitive environments such as surface water;
- Flowline age (based on associated well(s) in-service date);
- Spill history over the past five years; and
- Proximity to floodplains.

Accordingly, flowlines with these characteristics are more likely to be audited in 2017 as compared with last year. The top 10 percent of flowlines meeting these criteria will be audited. In addition, COGCC staff confirmed that they will audit flowlines in the San Juan Basin this year.

COGCC is tracking flowline-related spills, charting root causes, and reviewing this data semi-annually to identify trends. Thus far, COGCC reports that the top three flowline integrity issues are corrosion (49%), damage by natural force (*i.e.*, freezing) (21%), and incorrect operation (12%).

COGCC recommends that operators provide more detailed root cause and spill prevention information on spill report forms. During 2017 audits, operators should be prepared to discuss root cause information to the extent details were not included in the spill report.

In addition, operators are encouraged to develop a written flowline integrity management program that includes information regarding material selection, inspections, failures, repair procedures, spill response procedures, corrosion detection/prevention, and maintenance and repair records.

For more information regarding flowline audits and requirements, please contact Nicole Blevins.