



## **COGCC STANDARD OPERATING PRACTICES (SOP)**

### **FIR RESOLUTION FORM TECHNICAL GUIDELINES**

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#### **Document Control:**

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#### **Background**

**NOTE: THIS DOCUMENT WILL CHANGE ONCE THE ACTUAL FORM IS DEVELOPED. THIS DOCUMENT IS CREATED NOW TO SHOW THE READER THE INTENT BEHIND THE FORM AND THE IDEA OF THE WORKFLOW.**

#### *Purpose of this Document:*

The purpose of this standard operating practice (SOP) is to provide step by step instructions to operators and COGCC staff regarding the completion of the Field Inspection Report (FIR) Resolution Form, which allows oil and gas operators to (1) document completion of field inspection corrective actions or (2) request a factual review related to a corrective action.

The actual factual review request process, and when this process can be implemented, are documented in the “FIR Factual Resolution Request Process” and not in this document.

#### *Introduction:*

The COGCC will build a new eForm titled “FIR Resolution Form”. The purpose of this form is to allow operators to notify COGCC staff on completion of corrective actions and to request a factual review related to a corrective action. Once this new form is created, this form will become the sole form used by operators in response to corrective actions from a FIR. The Form 42 or Form 4 will no longer be allowed for these responses.

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## FIR Resolution Form Design

The below is the conceptual design of the new FIR Resolution Form.

FORM Res. Rev X/15	<b>State of Colorado</b> <b>Oil and Gas Conservation Commission</b> 1120 Lincoln Street, Suite 801, Denver, Colorado, 80203 <b>FIELD INSPECTION REPORT RESOLUTION FORM</b>		Overall Form Status: _____ CA Response Summary: _____ _____	Inspection Date: _____ FIR Submit Date: _____ Document Number: _____			
<b>Operator Information:</b>							
Operator Number: _____ Operator Name: _____ Address: _____ Phone: _____ City: _____ State: _____ Zip: _____							
<b>Location Information:</b>							
API Number: _____ Location ID: _____ Facility ID: _____ Facility Name: _____ Section: ___ Township: ___ Range: ___ QTRQTR: ___ Lat: _____ Long: _____							
<b>Operator Contact Information:</b>							
Operator Contact Name		Phone	Email				
<b>Correction Actions (CA) Table:</b>							
CA #	CA Verbiage from FIR	CA Response	Date of Completion	Basis For Review	Operator Comments	Upload Docs	Delete CA
1	DIRECTLY FROM FIR AND NOT EDITABLE	DROP DOWN. SEE BUSINESS REQ.	SEE BUSINESS REQ.	DROP DOWN. SEE BUSINESS REQ.	1,000 CHARACTER LIMIT. FREE TEXT BOX	↑	X
2	User manually completes this section except for verbiage which auto-populates from FIR					↑	X

## Process Steps for Completion of FIR Resolution Form

### Step 1 – Link to a FIR and Pre-populated Data

After a user logs into the eForms system and selects the FIR resolution Form, they will be asked to reference a FIR document number and click “Submit”. This will bring up the FIR Resolution Form with the following information pre-populated directly from the FIR:

1. FIR Inspection Date.
2. Date FIR was submitted to the operator.
3. Operator information (See above snapshot for specific fields).
4. Location information (See above snapshot for specific fields).
5. Corrective action language in table format (one row for each CA).

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## Step 2 – Operator Completes Contact Information

The operator will complete the operator contact information providing contact name, phone, and e-mail. This will be used for follow-up.

## Step 3 – Operator Completes the Corrective Action (CA) Table

The operator will then complete the CA table for each desired CA as prescribed below:

### **1. CA Response Field**

- a. Select “CA Completed” if the operator believes the CA has been completed.
- b. Select “Factual Review Request” if the operator believes a factual error per the “FIR Factual Resolution Request Process” occurred. **NOTE: The operator will have five business days from the date the FIR was submitted to the operator (not including the date it was sent) for this option. If the date the FIR was submitted exceeds this timeframe, this option will not be available to the operator.**

### **2. Date of Completion Field**

- a. If “CA Completed” was selected in the “CA Response Field” above, this becomes a mandatory date field for the operator to enter the date the CA was completed.
- b. If “Factual Review Request” was selected in the “CA Response Field” above, this field is greyed out and is not editable by the operator.

### **3. Basis for Review Field**

- a. If “CA Completed” was selected in the “CA Response Field” above, this field is greyed out and is not editable by the operator.
- b. If “Factual Review Request” was selected in the “CA Response Field” above, this becomes a mandatory drop down field with the following eight options: (1) Operator does not own or operate the location, (2) Equipment is not owned or controlled by the operator, (3) Equipment belongs to the surface owner, (4) Findings are inappropriately tied to multiple wells, (5) CA dates are not per the guidelines, (6) Corrective action dates are not attainable, (7) Requested documentation was submitted prior to the inspection, (8) Action requested was already completed prior to the inspection.

### **4. Operator Comments Field**

- a. A general comments box allowing the operator to enter text specific to that CA (one comment box per CA). There is no character limit.

### **5. Upload Docs Field**

- a. An icon that allows the operator to attach documents related to that specific CA.

### **6. Delete CA Field**

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- a. A red “X” that allows the operator to remove that CA from this form. This is done when the operator is not ready to respond to that specific CA.

### Step 4 – System Assigns the Overall Form Status and Routes to COGCC Contact

Based on the operator responses to the “CA Response” field described above, the system will assign the overall form status as follows:

1. If **all** rows in the CA table contain “CA Completed” in the “CA Response” field, the system will assign an overall status of “CA Completed”.
2. If **all** rows in the CA table contain “Factual Review Request” in the “CA Response” field, the system will assign an overall status of “Factual Review Request”.
3. If there are rows in the CA table that **contain both** “CA Completed” and “Factual Review Request” in the “CA Response” field, the system will assign an overall status of “Both CA Completed and Factual Review Request”.

The system will then automatically route the form to the appropriate COGCC contact as follows:

1. If **all** rows in the CA table contain “CA Completed” in the “CA Response” field, the form will be sent to the inspector of record with an e-mail subject of “CA Completed” and action is required from the inspector.
2. If **any** rows in the CA table contain “Factual Review Request” in the “CA Response” field, the form will be sent to both the inspector and their supervisor for review with an e-mail subject of “Factual Review Request” and action is required from the supervisor and inspector.

### Step 5 – COGCC Review and Response

Once the form is routed to either the inspector or supervisor, it will trigger an opportunity for the COGCC to make a decision on each CA and add comments.

For each CA regardless of whether the user selected the “CA Completed” or “Factual Review Request” option in the “CA Response” field, the system will add the following columns to the CA table allowing the COGCC to respond to each specific CA:

1. COGCC Decision
  - a) Mandatory drop down field with the following three options (1) Approved, (2) Approved pending re-inspection, and (3) Not Approved. This would be by CA. Meaning, the COGCC can approve one CA and not approve another.
2. COGCC Comments

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- a) A text box that becomes mandatory if “Not Approved” is selected above. Again, this is by CA.

Once the response form is completed by COGCC staff, the system will automatically append the FIR Resolution form (including COGCC comments) to the initial FIR report, the form will be sent to the operator, and the form posted to the COGCC database.

### Document Change Log:

<b>Change Date</b>	<b>Description of Changes</b>
December 16, 2015	Draft document created