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**Oil & Gas Conservation
Commission**

Department of Natural Resources

COGCC GUIDANCE

FIR TIMING AND DOCUMENTATION OF ISSUES

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Background

Purpose of this Document:

The purpose of this document is to provide guidance to COGCC inspection staff related to (1) the timing of when a Field Inspection Report (FIR) must be sent to the operator and (2) how to document findings in the FIR that ensures a single finding is not repeated several times throughout a single report or inappropriately tied to multiple wells or facilities.

FIR Timing Guidance

Introduction:

At times, FIRs are not sent to the operator until days after the inspection was performed. In some instances there are valid reasons why this occurred, such as new inspector training. However, there have been instances where valid reasons did not exist.

Guidance:

Unless specified below, FIRs must be sent to the operator by the end of the next business day following the inspection being completed. The following are exceptions to this:

1. New inspector training – Up to an additional three business days.

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- a. For a period between six to 12 months, new inspectors have their reports reviewed by their supervisor prior to sending to the operator. This could add up to an additional three business days.
2. Reclamation or Environmental inspections – Up to an additional 10 business days.
 - a. Reclamation and environmental inspections can be quite technical and frequently require a second opinion or more research. Because of this complexity, an additional 10 business days could be added to this timing.
 - b. Certain reclamation issues may take longer due to certain complexities but these should be limited.
 - c. Environmental projects that require third party lab work may also require additional time.
3. Inspector Emergency
 - a. At times, inspectors may be called away for an emergency which could impact these timeframes.
4. Issues with IT and computer equipment.

It is important to note that corrective action dates must be based off of the date the FIR was submitted to the operator and not the date of inspection. For example, if the date of inspection was September 1, 2015 but the FIR was not sent until September 5, 2015 and 15 days is the appropriate corrective action timeframe, then the corrective action date should be September 20, 2015.

An exception to the above could be cases that require corrective actions completed within 24 hours, such as removal of free oil or an imminent failure could result in actual impacts. In these cases, a direct phone call to the operator is required per the “Immediate Operator Notification Guidance” and a quicker corrective action date would be included in the FIR. Contact your supervisor with questions.

Documentation of FIR Findings

Introduction:

At times, an individual finding on a location or a well is documented in several places within the FIR making it appear that several findings exist on the FIR when only one finding truly exists. For example, trash found on location is documented in both the “Housekeeping” and “Interim Reclamation” sections of the FIR.

Other times, a finding associated with the location may be tied to several related wells on that location, thereby having the appearance of multiple findings. For example, a finding related to a perimeter berm on a location would be tied to not only the location ID but every well number on that location. If the location has 10 wells, it could look like there were 11 findings (one for the location and the 10 wells).

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Guidance:

Inspectors must not document the same finding in multiple places on the same FIR. Refer to the “Inspection Form Guidance” for details on how to complete each section of the FIR.

If performing an inspection on multiple wells on a single location, the following outlines how findings must be documented:

- 1. WORKING ON A POTENTIAL OIT SOLUTION TO THIS. MORE LATER ON THIS BUT THE GENERAL THOUGHT IS TO SEPARATE OUT WELLS THAT HAVE CORRECTIVE ACTIONS WITH WELLS THAT DO NOT HAVE CORRECTIVE ACTIONS IN SEPARATE FIRs.**

If performing an inspection related to the location and not the wells, such as reclamation, stormwater, berms, or weeds, the following outlines how findings will be documented:

1. If there are findings related to the location and there is a location ID in the system, a separate FIR is required for these location specific findings and tied to the location ID. These findings should not be associated with the wells on the location. For example, an inspector finds an issue with the perimeter berm on a location (location ID 123456) that has 10 wells. A FIR should be created for the location ID and the berm finding included on that FIR.
2. If there are findings related to the location and a location ID DOES NOT exist in the system, the inspector should work to create a location ID. Once a location ID is created, document per bullet #1 above.

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