

Flowline Rulemaking

Stakeholder Meeting

October 09, 2019



COLORADO
Oil & Gas Conservation
Commission

Department of Natural Resources

Jeff Robbins
Director

Key outcomes of Flowline Updates

- Meets SB 19-181's Mandates
 - Public health, safety, welfare, environment , and wildlife
 - §34-60-106(19)(a), (b), C.R.S.
- Register Flowline Systems
- Increased Integrity Management
- Updated Abandonment Rules
- Increased Repair Standards
- Leak Detection
- Mapping



Flowline Systems- Rule 1101.c.

- Operators can register a flowline system. *Rule 1101.c.*
 - Applies to any off-location flowline that does not carry produced water
- Flowline systems that carry produced water can continue to be registered as produced water transfer systems. *Rule 1101.e.*



Integrity management - Rules 1104 and 326

- Initial Pressure tests for a minimum of 4 hours. *Rule 1104.h.*
- Required integrity test and notification for reactivated off-location flowlines. *Rule 1102.o.*
- No less than 48 hours prior to returning an inactive, shut-in well or temporarily abandoned well to production an operator must notify COGCC to allow for inspection. *Rules 326.b. and c.*



Abandonment - Rule 1105

- Establish criteria for removing abandoned flowlines
 - Removal of flowlines is required unless there is an exception. *Rule 1105.e.*
 - ◆ Surface owner agreement.
 - ◆ Successful revegetation has occurred or is in process and removal of the line would harm revegetation and the line is in a sensitive area for wildlife or plants.
 - ◆ The federal government directs abandonment in place.
 - ◆ Removal of a segment of the line requires damaging a public road, railroad, bike path, or public right of way.
 - ◆ Removal requires removal from under a body of water.
 - ◆ The flowline or crude oil transfer line is co-located with other active utilities or is in a recorded right of way.



Abandonment - Rule 1105

- Notice requirements provide COGCC opportunity to inspect during abandonment



New Flowline Construction and Repair Standards - Rule 1102

- Installation of flowlines must be conducted in a manner that minimizes interference with wildlife. *Rule 1102.d.(7).*
- Added off-location flowline and crude oil transfer line repair standards. *Rule 1102.j.*



New Flowline Construction and Repair Standards - Rule 1102

- Created requirement for corrosion protection for tracer lines for non-metallic flowlines. *Rule 1102.d.(6)*
- Require use of excavation tape above buried lines. *Rule 1102.d.(6)*



Leak detection and reporting - Rule 1104

- Continuous pressure monitoring systems must meet API standards. *Rule 1104.j.*
- All integrity failures must be investigated, and spills reported and remediated. *Rule 1104.k.*

Mapping and Registration - Rule 1101

- Creating a public layer of COGCC-regulated off-location flowlines and crude oil transfer lines. *Rule 1101.f.*
- Require as-built drawings for off-location flowlines. Rule 1101.e.(2)



PHMSA Statuses- Rule 1101.a.

- Incorporating PHMSA statuses for new crude oil transfer lines and off-location flowlines
 - Transporting fluids
 - In repair or maintenance
 - Shut-in



Prehearing Process

- Thursday, October 17, 3-4pm - 1st Prehearing Conference in Wasatch
- Friday, October 18 - Party Status requests are due by 5pm
- Monday, October 28 - Prehearing Statements due by 5pm
- Friday, November 8 - Responsive Prehearing Statements due by 5pm
- Tuesday, November 12 - Prefiled Written Testimony due by 5pm
- Thursday, November 14 - Final Prehearing Conference, time TBD
- November 20-21st hearing, University of Northern Colorado, University Center Ballroom





Questions?



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