

Rule 911 Closure of Oil and Gas Facilities

Operator Training

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COLORADO
Oil & Gas Conservation
Commission

Department of Natural Resources

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Topics

- Rule 911 Background and Purpose
- Facilities that Require a Form 27 for Closure
- Form 27 Requirements
 - When to submit
 - Single Form 27s vs. Multiple Facility Form 27s
- Information to Include on the Initial Form 27
 - Proposed Sample Locations
- Closure Documentation
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- Questions



Rule 911 Background and Purpose

- Background - Formally identified the need for oil and gas production facility closure documentation in a February 2014 COGCC report, Risk-Based Inspections, Strategies to Address Environmental Risk Associated with Oil and Gas Operations.



Rule 911 Background and Purpose

- Purpose - is to prevent undocumented residual impacts from being left at a site after closure and potentially after bond release.



Facilities That Require a Form 27 for Closure

- Per Rule 911.a. - All Oil and Gas Facilities will be closed with an approved Form 27.
- An Oil and Gas Facility includes equipment or improvements used or installed at an oil and gas location for the exploration, production, withdrawal, treatment, or processing of crude oil, condensate, E&P waste, or gas.
- Basically any facility listed under the Facility Inquiry tool in the COGIS Database requires a Form 27 for closure.



Facilities That Require a Form 27 for Closure



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COGIS - Facility Inquiry

Enter search criteria:

Facility Type:

Reset

FLOWLINE SYSTEM
GAS COMPRESSOR STATION
GAS GATHERING PIPELINE SYSTEM
GAS LEAK
GAS PROCESSING PLANT
LAND APPLICATION SITE

You can make multiple selections by holding down the Ctrl key while clicking.

County:

Reset

ADAMS
ALAMOSA
ARAPAHOE
ARCHULETA
BACA
BENT

Select county here if you are **NOT** using API codes.

Facility Status:

Reset

AB - ABANDONED WELLBORE/COMPLETION
AC - ACTIVE
AL - ABANDONED LOCATION
CL - CLOSED
CM - COMMINGLED
DA - DRY AND ABANDONED

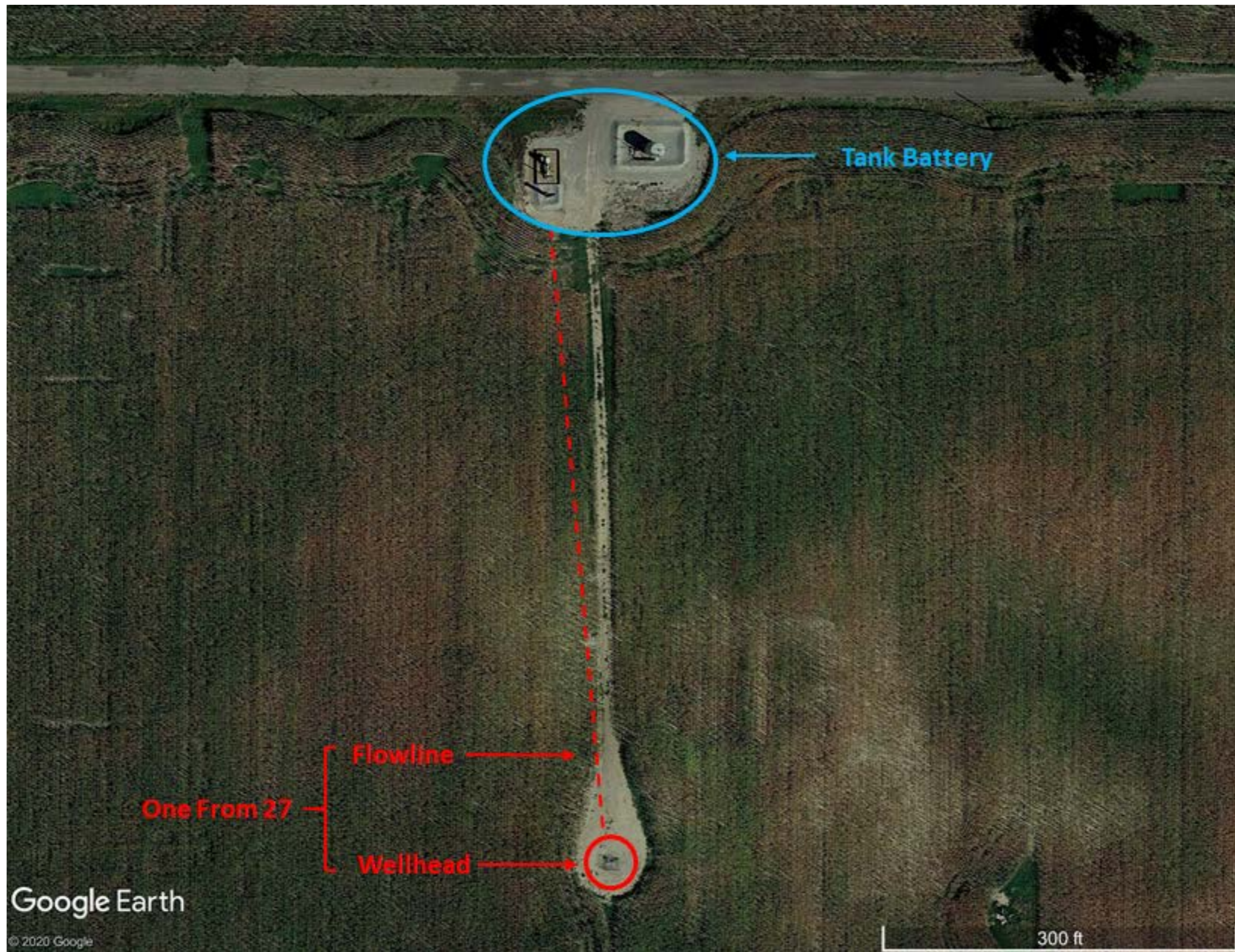


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Form 27 Requirements

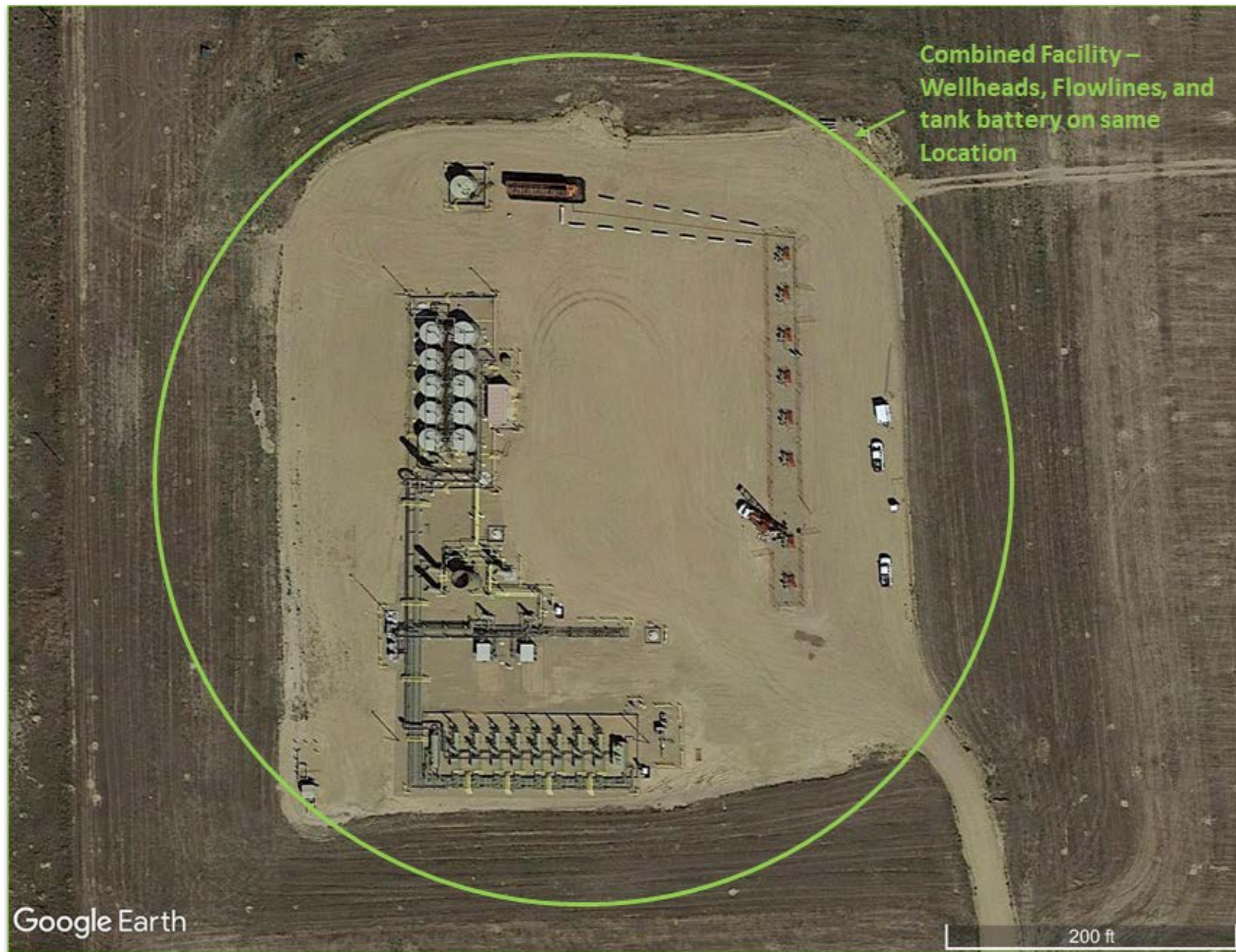
- When to submit a Form 27
 - Required for prior approval
 - COGCC will review/process the Form 27 within 30 days, generally much shorter timeframe for complete Form 27s.
- Single Form 27 vs. Multiple Form 27s
 - Basic rule of thumb - can use one Form 27 for multi-well pads where facilities are all on same location.
 - Individual Form 27s for off location wells.





Facility Closure - Once Form 27s should be submitted for the wellhead & flowline and a separate Form 27 should be submitted for tank battery closure.





Facility Closure - A single Form 27s can be submitted for wellhead, flowline, and tank battery closure; individual Form 27s will also be accepted if necessary.



Information to Include on the Initial Form 27

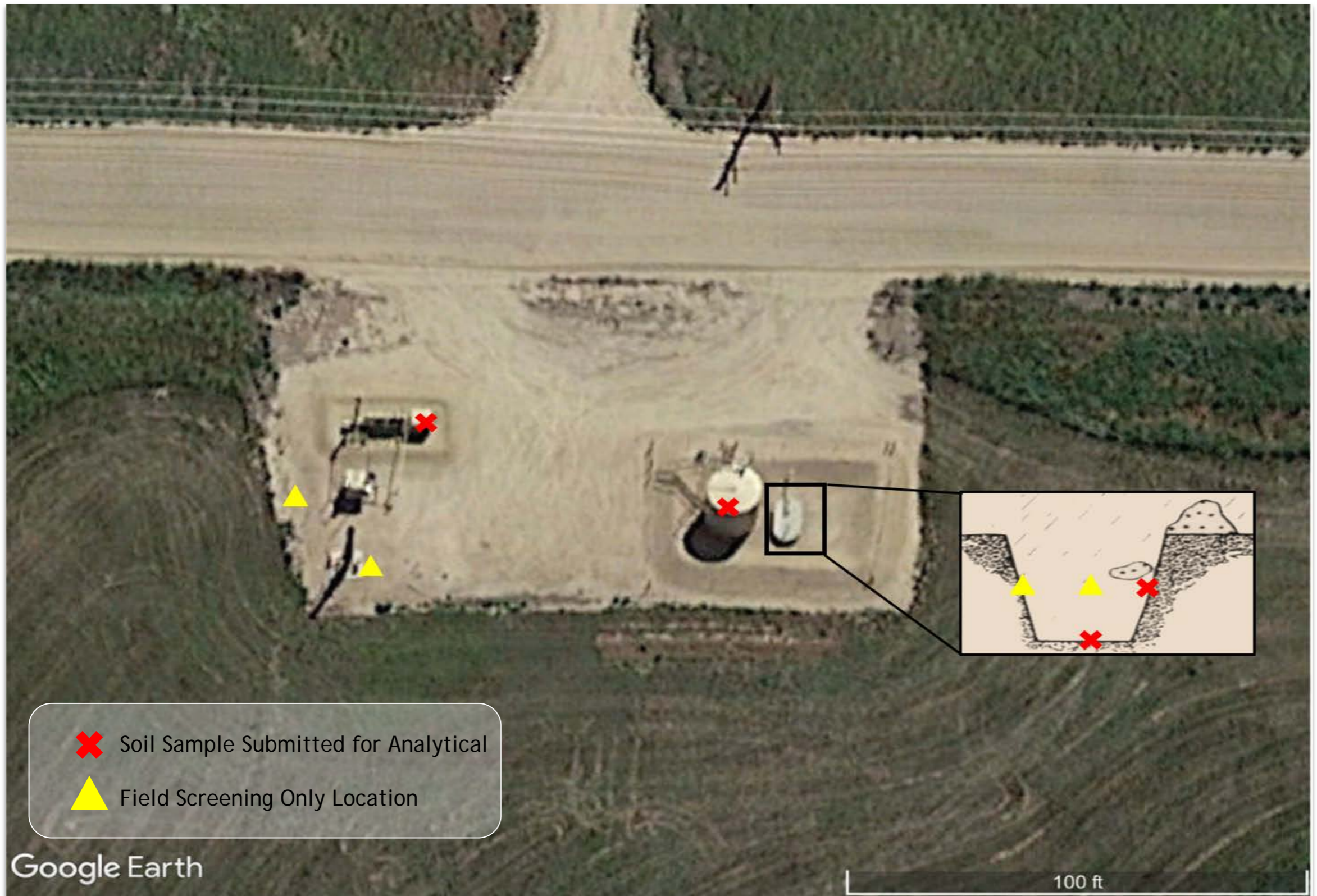
- The correct Latitude and Longitude for the work area (e.g. buried vessel, corner of Pit, end of Flowlines, southeastern tank battery berm);
- A desktop review of any Sensitive Areas within a quarter mile (surface water, water wells, wetlands, High Priority Habitat, residences, businesses, etc.);
- A site map showing the proposed work area;
- Initial action summary, including the scope of work to be done;
- Planned waste disposal pursuant to Rules 905 and 906;



Information to Include on the Initial Form 27

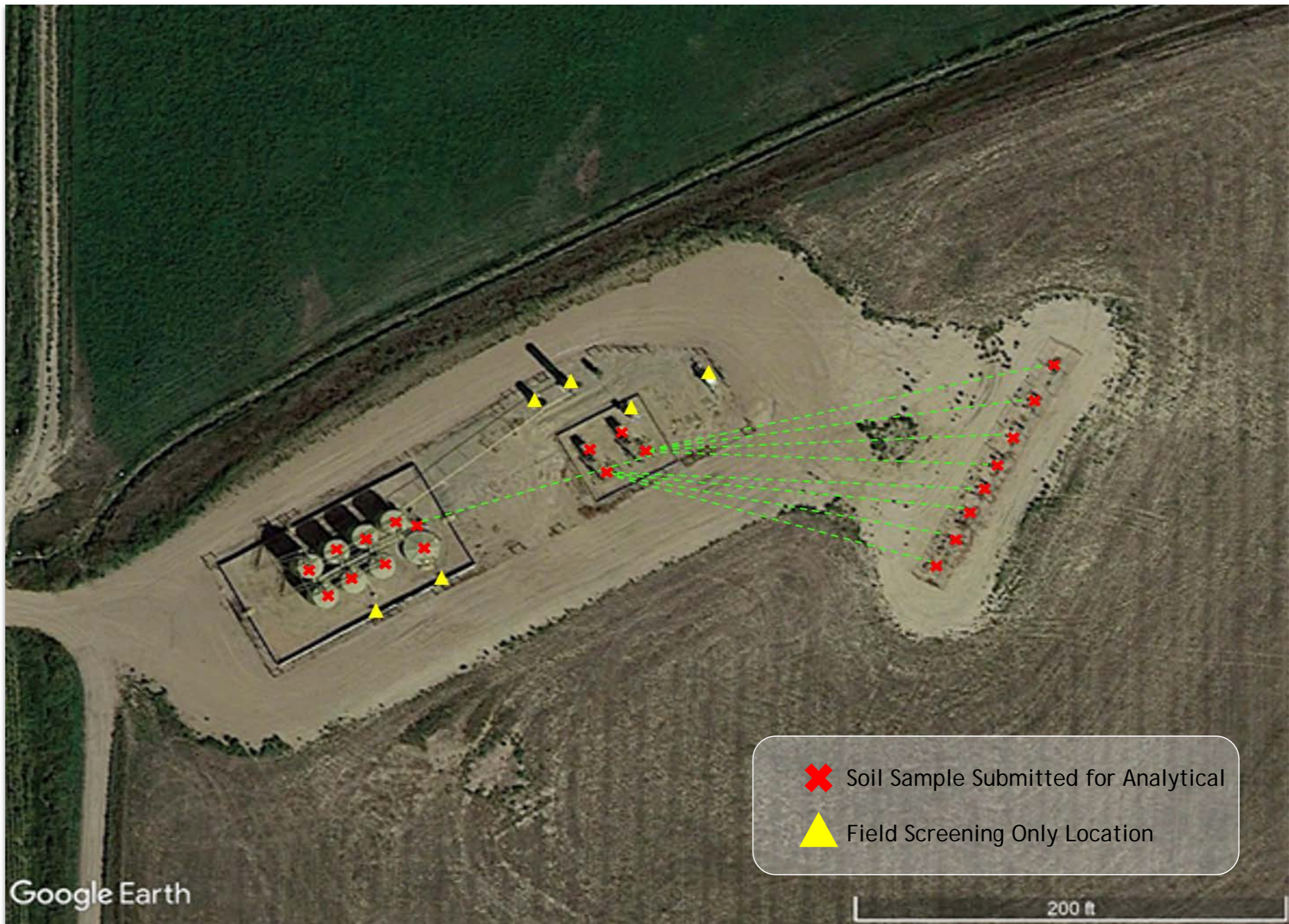
- Proposed soil sampling plan including planned sample analysis and sample locations.
- Operator will provide a facility diagram or aerial photograph depicting site equipment and proposed sample locations.;
- A proposed Groundwater sampling plan if applicable;
- Date of Surface Owner notification/consultation;
- Proposed start date and duration;
- Timeline for follow up reporting, typically 45 days after work is completed (work is considered completed when final laboratory reports are received or field work is completed whichever occurs later).





Facility Closure Example 3 - Proposed sample locations for a smaller tank battery. Example shows what Operator may submit with an Initial Form 27 for facility closure.





Facility Closure Example 4 - Proposed sample locations for a larger tank battery. Example shows what Operator may submit with an Initial Form 27 for facility closure.



Closure Documentation

- Provide the same closure documentation you would for any remedial investigation.
 - Sample location diagram (including sample depths);
 - Summary table(s) of field screening and analytical results;
 - Photo logs linked to or referencing specific sample or field screening locations;
 - Soil boring logs or monitor well construction logs if applicable;
 - Waste disposal documentation;
 - Final Reclamation Plan if applicable.



Closure Documentation

Tank Battery Closure Checklist										
COGCC Rule 911.a.(4) Environmental Site Closure Assessment Field Form										
Additional attachments (optional):		Pit Closure		Wellhead Closure		Flowline Closure		Partially Buried Vault Closure		
Site Name & COGCC Facility Number:		Date:					Remediation Project #:			
Associated Wells:		Age of Site:					Number of Photos Attached:			
Location: (GPS coordinates of southeastern berm)						Estimated Facility Size (acres):				
General Condition of Site: (General observations regarding housekeeping, corrosion, waste management, etc.)										
USCS Soil Type:					Estimated Depth to Groundwater:					
Hydrocarbon Impacted Soils / Spills: (Note estimated size and if impact appears to be surficial or extends to an unknown depth)										
Salt Crusted Soils or Impacted Vegetation: (Note estimated size and if impact appears to be surficial or extends to an unknown depth)										
Tanks										
Tank Contents										
Size (barrels)										
Age										
Construction Material										
Tank type (ACT, BPT, etc.)										
Visual Integrity of Tank										
Condition of tank										
PID Readings:										
Soil impacts present at valves or hatches?										
PID Readings:										
Sample taken? Location/ Sample ID#										
Photo Number(s)										
Other observations regarding tanks:										
Separators										
Separator size										
Vertical or Horizontal										
Age										
Soil impacts observed?										
PID Readings:										
Sample taken? Location/ Sample ID#										
Photo Number(s)										
Other observations regarding separators:										

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Substantive Changes to a Site

- Provide a Form 27 for substantive changes to a site.
 - Complete upgrade of a tank battery replacing with new equipment and piping;
 - Removing several pieces of a equipment at a large production facility;
 - Replacing a flowline;
 - If in doubt, ask your area EPS prior to removing equipment.



QUESTIONS?

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