



## ECMC OPERATOR GUIDANCE

### RULES 609.C, 1101, 1102, AND 1105: OOSLAT GUIDANCE

---

#### Document Control:

Created Date:	July 31, 2023
Last Updated Date:	July 31, 2023
Last Updated By:	Ellice Whittington
Review Cycle:	Yearly Review
Document Owner:	Mark Schlagenhauf
Work Units:	Engineering, Compliance, Environmental

#### Definition Citation

**OUT OF SERVICE LOCKS AND TAGS (“OOSLAT”)** means locks and tags that an operator applies when equipment is in pre-commissioned status, is placed in an out of service status, or is in the process of abandonment. Out of service locks and tags must be visibly different from lock out and tag out devices used during repair or maintenance of the equipment.

#### Rule Citation

Rules 609.c., 1101.a., 1102.o., and 1105.b. – See APPENDIX A on page 4.

#### Rule 609.C, 1101, 1102, AND 1105: OOSLAT Guidance

The purpose of the OOSLAT process is to ensure that upon accessing a site, anyone can discern what lines and tanks and process vessels are active and available for use and which are not.

The purpose of this OOSLAT guidance is to provide operators with guidelines on how to comply with Rules 1101, 1102, 1105, and Rule 609.c. of the Colorado Oil and Gas Conservation Commission (COGCC), which outline the criteria for applying OOSLATs.

#### Background

It is critically important to keep out of service flowlines and crude oil transfer lines from being connected to active sources of fluids or pressure. On November 21, 2019, the Colorado Oil and Gas Conservation Commission (COGCC) defined OOSLAT, harmonizing COGCC rules with those of PHMSA and OSHA. On January 15, 2021, the OOSLAT process became applicable for tanks and process vessels in order to minimize adverse impacts to public safety and wildlife from tanks and process vessels that are out of service.

## RULE 609.C, 1101, 1102, AND 1105: OOSLAT GUIDANCE

OOSLATs are not the same as Lockout Tagout (LOTO) devices. COGCC's existing definition of lock out and tag out devices may only be used when an operator is locking out and tagging out equipment for repairs or maintenance according to OSHA. OOSLAT is a separate lockout/tag out process for out of service flowlines, tanks, and process vessels—enabling operators to comply with federal and state requirements.

### General Notes

#### Flowline Requirements

OOSLATs are required for flowlines in the following situations:

- Pre-commissioned status
  - When to apply: when flowline has been installed but has yet to be connected to associated equipment.
  - Reporting Requirements: none.
- Out-of-service status
  - When to apply: when flowline has been shut in for more than 90 days.
  - Reporting Requirements: a Flowline Report - Form 44 Out of Service Report within 120 days of applying OOSLAT (Off-Location Flowlines only).
- Prior to abandonment
  - When to apply: when flowline has been removed from use with intent to abandon
  - Reporting Requirements: a Flowline Report - Form 44 Out of Service Report within 120 days of applying OOSLAT if the flowline has not already been abandoned (Off-Location Flowlines only).

#### Tank and Vessel Requirements

OOSLATs are required for tanks and process vessels in the following situations:

- Out-of-service status
  - When to apply: when equipment has been declared out of service per Rule 609.c.
  - Reporting Requirements: none

#### Tag Information

When applying OOSLAT, the associated tags must contain the following information:

- ✓ Operator Name
- ✓ Status of Equipment
- ✓ Reason for the tag
- ✓ Date tag was placed

## RULE 609.C, 1101, 1102, AND 1105: OOSLAT GUIDANCE

- ✓ How to reach person who placed the tag

## RULE 609.C, 1101, 1102, AND 1105: OOSLAT GUIDANCE

### APPENDIX A

#### RULE CITATION - Rule 609

#### 609. INSPECTIONS

c. **Out of Service Tanks and Process Vessels.** Out of service Tanks and process vessels are not subject to the inspection standards in Rule 609.b. Operators will:

- (1) Isolate or disconnect the Tank or process vessel from sources of oil, condensate, produced water, or natural gas;
- (2) Depressurize and evacuate all hydrocarbons and produced water from the Tank or process vessel and test the interior of the Tank or process vessel to show that it is safe for designated entry, cleaning, or repair work.;
- (3) Apply OOSLAT; and
- (4) Equip any openings in the Tank or process vessel with screens or other appropriate equipment to prevent entry by wildlife, including birds and bats.

#### RULE CITATION - Rule 1101.a

#### 1101.a. Flowline and Crude Oil Transfer Line Statuses.

- (1) Pre-Commissioned Status means a constructed flowline or crude oil transfer line that:
  - A. Has not been connected or opened to sources of oil, condensate, produced water, or natural gas;
  - B. Is isolated from active status assets;
  - C. Does not contain oil, condensate, produced water, or natural gas; and
  - D. Is OOSLAT.
- (2) Active Status means a flowline or crude oil transfer line that is connected or open to sources of oil, condensate, produced water, or natural gas or is not in the pre-commissioned, out-of- service, or abandoned status, or contains these products.

## **RULE 609.C, 1101, 1102, AND 1105: OOSLAT GUIDANCE**

(3) Out-of-Service Status means a flowline or crude oil transfer line that is associated with an inactive well or the operator has ceased normal operations. For an out of service line, the operator must:

- A. Isolate or disconnect it from sources of oil, condensate, produced water, or natural gas;
- B. Evacuate all hydrocarbons and produced water to ensure the line is safe and inert and depressurize the line; and
- C. apply OOSLAT.

### **RULE CITATION - Rule 1102.o.(2)**

**1102.o. Requirements for shut-in or out of service off-location flowline or crude oil transfer line for inspection.**

(2) For an off-location flowline or a crude oil transfer line that has been out of service for more than 90 days, the operator must:

- A. Within 120 days of applying OOSLAT, submit a Flowline Report, Form 44, to the Director identifying the off-location flowline or crude oil transfer line or segment thereof that has been taken out of service and the outcome of the most recent integrity management test.
- B. Pressure test the off-location flowline or crude oil transfer line in accordance with Rule 1104.h. before returning the line to active status; and
- C. Not less than 48 hours prior to pressure testing, submit notice with a Field Operations Notice, Form 42 - Notice of Return to Service, to the Director of the scheduled date for the pressure test to allow the Commission to inspect during the pressure test.

### **RULE CITATION - Rule 1105.b**

**1105. ABANDONMENT**

## RULE 609.C, 1101, 1102, AND 1105: OOSLAT GUIDANCE

b. Upon removing a flowline or crude oil transfer line from use with the intent to abandon, an operator must immediately apply OOSLAT to the risers. OOSLAT must stay in place at all times during the process of abandoning the flowline or crude oil transfer line until the operator removes the riser.

### Document Change Log

Change Date	Description of Changes
July 31, 2023	Document Created and Finalized