

COGCC OPERATOR GUIDANCE

Rule 1101.b.(3) Recommended practices for gathering location data

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Purpose:

The purpose of Rule 1101.b.(3) is to protect public health, safety, welfare, and the environment by ensuring COGCC's database contains a transparent and complete inventory and location data for all crude oil transfer lines and off-location flowlines.

Guidance Discussion:

On or before December 1, 2020, Rule 1101.b.(3), requires operators to submit flowline location data for all off-location flowlines constructed before May 1, 2018. At a minimum, the horizontal positional accuracy of the data must meet or exceed +/- 25 feet. The Rule also directs operators to gather the best data possible without using invasive methods.

Operators must submit location data on a new Flowline Report, Form 44, using the existing location ID. The operator must include a GIS file as an attachment in a format consistent with existing COGCC geodatabase guidance documents. Specific format requirements are available on the COGCC website under the instructions tab for the Flowline Report, Form 44.

Operators should choose a flowline locate method that will allow for Form 44 data submission by the December 1, 2020 deadline. The deadline is a priority for Staff to ensure that COGCC's database contains a complete geodatabase inventory for the location of all crude oil transfer lines and off-location flowlines. As allowed in Rule 1101.b.(3), COGCC does not expect that operators use invasive methods, i.e., pothole, to locate these off-location flowlines. COGCC expects operators respect surface owner

rights and uses of their property when considering methods to identify the position and alignment flowlines. The following methods are acceptable:

- Conventional electronic pipe locators for metallic off-location flowlines or non-metallic off-location flowlines with tracer wire
- Digitizing existing surveys or maps of the off-location flowline's location or right of way
- Digitizing historic aerial imagery of the surface disturbances from construction and installation of the off-location flowline
- Surveying (walking, driving, or aerial) off-location flowline locations using various remote-sensing devices
- Smart pigs or in-line inspection or utility probes

Operators are responsible for using a method that, at a minimum, achieves the horizontal positional accuracy of +/- 25 feet. If multiple methods would gather data within the minimum accuracy requirement, operators should use the method that gathers the most accurate horizontal positional data so long as the method ensures compliance with the December 1, 2020, submission deadline.

If an operator obtains more accurate location data for off-location flowlines in response to CO 811 requests, or through maintenance and repair, the operator will provide the more accurate location data by submitting an updated Flowline Report, Form 44.

Separately from COGCC requirements, operators are reminded that off-location flowlines are subject to CO 811's requirements, and certain portions of off-location flowlines may be subject to PHMSA's jurisdiction. Operators should communicate with these other entities regarding their specific requirements.