

**FORM
INSP**Rev
X/20**State of Colorado
Oil and Gas Conservation Commission**1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109

Inspection Date:

08/19/2024

Submitted Date:

08/21/2024

Document Number:

713601331

FIELD INSPECTION FORMLoc ID 321653 Inspector Name: COSTA, RYAN On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**

ECMC Operator Number: 96730

Name of Operator: WILLIFORD ENERGY COMPANY

Address: 6060 AMERICAN PLAZA SUITE 760

City: TULSA State: OK Zip: 74135

Status Summary:

- ☒ THIS IS A FOLLOW UP INSPECTION
- ☒ FOLLOW UP INSPECTION REQUIRED
- ☐ NO FOLLOW UP INSPECTION REQUIRED

Findings:

7 Number of Comments

6 Number of Corrective Actions

- ☒ Corrective Action Response Requested

**ANY CORRECTIVE ACTION(S) FROM
PREVIOUS INSPECTIONS THAT HAVE NOT
BEEN ADDRESSED ARE STILL APPLICABLE****Contact Information:**

Contact Name	Phone	Email	Comment
Sanchez, Chris		chris.sanchez@state.co.us	
Storts, Doug		pds@willifordenergy.com	
GROWNS LARRY		lgrowns@willifordenergy.com	
Enforcement		dnr_ecmcenforcement@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
207687	WELL	PR	06/01/2021	OW	017-06622	RHOADES UNIT 5-4	RI
321653	LOCATION	AC			-	RHOADES UNIT-613S48W 32NENE	RI

General Comment:

This is a follow up of the previous inspections; #713600861, #713601089.
The corrective actions of the previous inspections have not been completed.
Non-compliance with the Rules will be referred to enforcement.

Operator is directed to perform corrective actions outlined on this inspection report immediately.

Location

Lease Road:			
Type	Access		
comment:	There are areas where vehicles are driving outside of the access road boundary causing unnecessary disturbance that will need to be reclaimed. Repeated or flagrant instance(s) of failure to restrict lease access to lease roads which result in unreasonable land damage or crop losses shall be subject to a penalty under Rule 523. Vehicle tracks were observed outside of the access road boundary. Previous corrective action was not completed.		
Corrective Action:	Operator shall abide by the reclamation rules to minimize surface disturbances per the 1002e rule.	Date:	

Overall Good: ☐

Signs/Marker:			
Type	TANK LABELS/PLACARDS		
Comment:	The containers and barrels do not have proper labeling.		
Corrective Action:	Install sign to comply with Rule 605.h.	Date:	

Emergency Contact Number:

Comment:

Corrective Action:

Date: _____

Overall Good: ☐

Spills:				
Type	Area	Volume		
Lube Oil	Pump Jack			
Comment:	There is oil leaking out of the engine exhaust pipe which is staining the soil and needs to be cleaned up. The engine to the pumpjack was running at the time of this inspection and there was oil dripping from the engine. There is sand spread around the pumpjack where oil staining was observed which was not cleaned up. Previous corrective action was not completed.			
Corrective Action:	Non E&P Waste not properly stored, handled, transported, treated, or disposed per Rule 906.			Date:
Crude Oil	WELLHEAD			
Comment:	The spill that was initially observed on 3/26/24 has not been cleaned up. There was sand spread over the top of the spilled area to cover up the oil stained soils. Previous corrective action was not completed.			
Corrective Action:	Control and contain spills/releases and clean up per Rule 912.a.			Date:

In Containment: No

Comment:

☒ Multiple Spills and Releases?**Venting:**

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type		
Comment:		

Corrective Action:		Date:	
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Environmental			
Spills/Releases:			
Type of Spill: OIL		Estimated Spill Volume:	
Comment:	A form 19 initial was submitted on 4/15/2024 but there has been no supplemental form 19 submitted as requirred within 90 days of the spill. The spill has not been cleaned up and the operator spread sand over the spilled area to cover up impacted soils.		
Corrective Action:	Comply with Rule 912.b.		Date:
Reportable:	GPS: Lat	Long	
Proximity to Surface Water:	Depth to Ground Water:		
Water Well Complaint:			
DWR Receipt Num:	Owner Name:	GPS :	Lat Long
Field Parameters:			
Sample Location:		Comment:	

Reclamation - Storm Water - Pit

Storm Water:

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment
	Fail		Fail	Material Handling And Spill Prevention	Fail	

Comment: There are areas of the access road which are not stabilized or maintained. There are areas where stormwater is pooling and vehicles are driving around the impacted road causing unnecessary disturbance. The access road needs to be repaired and maintained with BMP's such as road base, gravel, culverts, ect. There are also chemical barrels with no secondary containment not properly stored. There is a container full of oil that is close to spilling over. Previous corrective action was not completed

Corrective Action: Install or repair required BMPs per Rule 1002.f.(2)

Date:

Pits: ☒ NO SURFACE INDICATION OF PIT

Attached Documents

You can go to ECMC Images (<https://ecmc.state.co.us/weblink/>) and search by document number:

Document Num	Description	URL
713601332	Inspection Photos	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6673048