

**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:

713601335

**FIELD INSPECTION FORM**

Loc ID 321656 Inspector Name: COSTA, RYAN On-Site Inspection  2A Doc Num: \_\_\_\_\_

**Status Summary:**

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

**Operator Information:**

ECMC Operator Number: 96730  
Name of Operator: WILLIFORD ENERGY COMPANY  
Address: 6060 AMERICAN PLAZA SUITE 760  
City: TULSA State: OK Zip: 74135

**Findings:**

- 9 Number of Comments
- 8 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
GROWNS LARRY		lgrowns@willifordenergy.com	
Enforcement		dnr_ecmcenforcement@state.co.us	
Sanchez, Chris		chris.sanchez@state.co.us	
Storts, Doug		pds@willifordenergy.com	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
207694	WELL	PR	11/01/2021	OW	017-06629	RHOADES UNIT 5-6	RI
321656	LOCATION	AC			-	RHOADES-613S48W 32NWNW	RI

**General Comment:**

This is a follow up of the previous inspections; #713600859, #713601091.  
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.

<b>Location</b>			
<b>Lease Road:</b>			
	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. 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: <input type="checkbox"/>			
<b>Signs/Marker:</b>			
	Type	TANK LABELS/PLACARDS	
	Comment:	There is no labeling of the barrels next to the wellhead.	
	Corrective Action:	Install sign to comply with Rule 605.h.	Date:
Emergency Contact Number:			
	Comment:	<input style="width: 100%;" type="text"/>	
	Corrective Action:	<input style="width: 100%;" type="text"/>	Date: _____
<b>Good Housekeeping:</b>			
	Type	TRASH	
	Comment:	There is a pile of oily rags at the south side of the location that must be properly disposed. There were aerisol cans and oil containers laying on the ground.	
	Corrective Action:	Comply with Rule 606 and dispose of all containers , rags, and trash.	Date:
	Type	OTHER	
	Comment:	There is oily fluid in the secondary containment of the barrel next to the wellhead and no wildlife protection/netting is installed.	
	Corrective Action:	Comply with Rule 902. Install or repair wildlife protection equipment.	Date:
Overall Good: <input type="checkbox"/>			
<b>Spills:</b>			
	Type	Area	Volume
	Lube Oil	Pump Jack	
	Comment:	There is oil still leaking from the engine. There is sand spread around the pumpjack to cover up the oil stained soils. The oil stained soils have not been cleaned up and properly disposed. Previous corrective action was not completed.	
	Corrective Action:	Non E&P Waste not properly stored, handled, transported, treated, or disposed per Rule 906.	
	Crude Oil	WELLHEAD	
	Comment:	The spill that was initially observed on 3/26/24 has not been cleaned up. Previous corrective action was not completed.	
	Corrective Action:	Control and contain spills/releases and clean up per Rule 912.a.	
	In Containment:	No	
	Comment:	<input style="width: 100%;" type="text"/>	
	<input checked="" type="checkbox"/> Multiple Spills and Releases?		
<b>Venting:</b>			
	Yes/No		

Comment:			
Corrective Action:		Date:	

**Flaring:**

Type			
Comment:			
Corrective Action:		Date:	

**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 required 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:**

Lat \_\_\_\_\_ Long \_\_\_\_\_

DWR Receipt Num: \_\_\_\_\_

Owner Name: \_\_\_\_\_

GPS : \_\_\_\_\_

**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 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 and culverts. The roads needs to be built up to allow stormwater drainage. Previous corrective action was not completed.

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

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
713601336	Inspection Photos	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6673050">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6673050</a>