

**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:

01/28/2025

Submitted Date:

01/30/2025

Document Number:

713601829

FIELD INSPECTION FORM

Loc ID 321658 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:

- 6 Number of Comments
- 4 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
Storts, Doug		pds@willifordenergy.com	
GROWNS LARRY		lgrowsns@willifordenergy.com	
Sanchez, Chris		chris.sanchez@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
207697	WELL	SI	06/13/2024	GW	017-06632	RHOADES UNIT 5-7	RI

General Comment:

This is a follow up reclamation inspection of the RHOADES Unit #5-7 wellsite.
 The corrective actions of the previous inspection was not completed.
 See attached photos and additional details within this report

Location

Overall Good:

Emergency Contact Number:

Comment:

Corrective Action:

Date: _____

Good Housekeeping:

Type

OTHER

Comment: Previous inspection noted, "There are unused parts, barrels, and oily rags on location hat must be removed." It appears some of these items were removed however additional also need to be removed.

Corrective Action: **Comply with Rule 606.**

Date:

Overall Good:

Spills:

Type

Area

Volume

Comment: Previous inspection noted, "There are stained soils next to the pumpjack that must be cleaned up and properly disposed." It appears there are impacted soils that have not been cleaned up. Additionally, there is cement spilled at the location and equipment leaks that will need to be cleaned up.

Corrective Action: **Non E&P Waste not properly stored, handled, transported, treated, or disposed per Rule 906. Conduct maintenance on equipment, cleanup stained material and review self inspection processes.**

Date:

In Containment: No

Comment:

Multiple Spills and Releases?

Venting:

Yes/No

Comment:

Corrective Action:

Date:

Flaring:

Type

Comment:

Corrective Action:

Date:

Environmental

Spill/Remediation:

Comment: There are stained soils at the wellhead that must be cleaned and properly disposed. There are also visible impacts to soils at the location that will need to be investigated and sampled. There has been no form 27 submitted for decommissioning of the wellsite upon abandonment.

Corrective Action: Comply with Rule 913.c.(9). Submit form 27 Remediation Workplan for the decommissioning of this facility.

Date: 02/06/2025

Emission Control Burner (ECB): _____

Comment: _____

Pilot: _____ Wildlife Protection Devices (fired vessels): _____

Reclamation - Storm Water - Pit

Interim Reclamation:

Date Interim Reclamation Started: _____ Date Interim Reclamation Completed: _____

Land Use: _____

Comment: _____

1002 SITE PREPARATION AND STABILIZATION

1002a. FENCING _____

Comment _____

Corrective Action _____

Date _____

1002b. SOIL REMOVAL AND _____

Comment _____

Corrective Action _____

Date _____

1002c. PROTECTION OF SOILS _____

Comment _____

Corrective Action _____

Date _____

1002E. SURFACE DISTURBANCE MINIMIZATION _____

Comment _____

Corrective Action _____

Date _____

1003a. Waste and Debris removed? _____

Comment _____

Corrective Action _____

Date _____

Unused or unneeded equipment onsite? _____

Comment _____

Corrective Action _____

Date _____

Pit, cellars, rat holes and other bores closed? _____

Comment _____

Corrective Action _____

Date _____

Guy line anchors marked? _____

Comment _____

Corrective Action _____

Date _____

1003b. Area no longer in use? _____ Production areas stabilized ? _____
 1003c. Compacted areas have been cross ripped? _____
 1003d. Drilling pit closed? _____ Subsidence over on drill pit? _____
 Cuttings management: _____
 1003e. Areas no longer needed for drilling or subsequent operations for have been re-vegetated to 80% of pre-existing? _____
 Production areas have been stabilized? _____ Segregated soils have been replaced? _____

RESTORATION AND REVEGETATION

Cropland

Top soil replaced _____ Recontoured _____ Perennial forage re-established _____

Non-Cropland

Top soil replaced _____ Recontoured _____ 80% Revegetation _____

1003e. INTERIM VEGETATION TRANSECT
 TRANSECT RESULTS OF DISTURBED AREA% _____
 TRANSECT RESULTS OF REFERENCE AREA% _____
 TOTAL % OF DESIRABLE VEGETATION COVER _____
 VEGETATIVE COVER _____

1003 f. Weeds Noxious weeds? _____

Comment

Corrective Action

Date _____

Overall Interim Reclamation

Final Reclamation/ Abandoned Location:

Date Final Reclamation Started: _____ Date Final Reclamation Completed: _____

Final Land Use: _____

Reminder: _____

Comment:

Well plugged _____ Pit mouse/rat holes, cellars backfilled _____

Debris removed _____ No disturbance /Location never built _____

Access Roads Regraded _____ Contoured _____ Culverts removed _____

Gravel removed _____

Location and associated production facilities reclaimed _____ Locations, facilities, roads, recontoured _____

Compaction alleviation _____ Dust and erosion control _____

Non cropland: Revegetated 80% _____ Cropland: perennial forage _____

Weeds present _____ Subsidence _____

1004.d. FINAL VEGETATION TRANSECT
 TRANSECT RESULTS OF DISTURBED AREA% _____
 TRANSECT RESULTS OF REFERENCE AREA% _____
 TOTAL % OF DESIRABLE VEGETATION COVER _____
 VEGETATIVE COVER _____

Comment:

It appears the well was plugged and abandoned on 12/18/2024. All equipment including pipe risers, electric utilities, guyline anchors and debris must be removed within 3 months of well abandonment. The flowline must be abandoned per Rule 1105 requiring a form 44 notice filed within 30 days prior to flowline abandonment. It appears there is historic impacts to soils at the location which will need to be evaluated for reclamation suitability and remediated. The access road and location will need to be recounted and reclaimed back to pre-existing conditions.

Corrective Action:

Date _____

Overall Final Reclamation

Well Release on Active Location

Multi-Well Location

Storm Water:

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment

Comment:

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. Since the well has been PA'd the access road will have to be reclaimed. The eroded areas of the road may require imported topsoil to adequately match the surrounding contours. All disturbed areas will need to be reclaimed and stabilized.

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
404076061	INSPECTION SUBMITTED	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6898775
713601830	Inspection Photos	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6898742