

**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:

04/09/2025

Submitted Date:

04/14/2025

Document Number:

713602046**FIELD INSPECTION FORM**Loc ID 321653 Inspector Name: COSTA, RYAN On-Site Inspection ☐ 2A Doc Num:                     **Operator Information:**ECMC Operator Number: 96730Name of Operator: WILLIFORD ENERGY COMPANYAddress: 6060 AMERICAN PLAZA SUITE 760City: TULSA State: OK Zip: 74135**Status Summary:**

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

**Findings:**10 Number of Comments7 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	
ECMC Enforcement		dnr_ecmcenforcement@state.co.us	
Storts, Doug		pds@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
207687	WELL	PR	06/01/2021	OW	017-06622	RHOADES UNIT 5-4	RI

**General Comment:**

This is a follow up of the previous inspections and in regard to NOAV #404079128.  
See all comments and attached photos for inspection observations.

Location			
<b>Lease Road:</b>			
Type	Access		
comment:	There are areas where vehicles have driven outside of the access road boundary causing unnecessary disturbance that will need to be reclaimed. There are areas of the access road that are not maintained.		
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	CONTAINERS		
Comment:	New label has been placed on the container.		
Corrective Action:			Date:
Emergency Contact Number:			
Comment:	<input type="text"/>		
Corrective Action:	<input type="text"/>		Date: <input type="text"/>
<b>Good Housekeeping:</b>			
Type	OTHER		
Comment:	There has been secondary containment placed at the chemecial container since the previous inspection. The containment has oily fluids and needs to be covered/netted to prevent wildlife entry.		
Corrective Action:	Comply with Rule 902.b. Install or repair wildlife protection equipment.		Date: 04/17/2025
Type	OTHER		
Comment:	The pumpjack engine has been replaced with an electric motor.		
Corrective Action:			Date:
Overall Good: <input type="checkbox"/>			
<b>Spills:</b>			
Type	Area	Volume	
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. The spill has been reported with a form 19 and has transitioned to a remediation project. It appeared that three samples (holes) were collected however further delineation will be required.		
Corrective Action:	Control and contain spills/releases and clean up per Rule 912.a.		Date:
	Pump Jack		
Comment:	The leaking engine motor has been removed since the previous inspection. It is unknown if all stained soils were properly cleaned up by the pumpjack unit since there had been sand spread over this area.		
Corrective Action:	Non E&P Waste not properly stored, handled, transported, treated, or disposed per Rule 906.		Date:
In Containment: No			
Comment:	<input type="text"/>		
<input type="checkbox"/> Multiple Spills and Releases?			
<b>Venting:</b>			
Yes/No			

Type		
Comment:		
Corrective Action:		Date:

Environmental	
<b>Spill/Remediation:</b>	
Comment:	A form 27 was submitted on 3/3/2025 which has Conditions of Approval for the remediation project.
Corrective Action:	Comply with Rule 912.b. Comply with COA's of form 27 Remediation Workplan
Date: _____	
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  
SEGREGATION \_\_\_\_\_

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

There has been new disturbance with the installation of the buried electric utility line. The disturbed soils will need to be seeded and stabilized before the upcoming growing season. Additionally all areas of disturbance where vehicles drove around the damaged access road will need to be reclaimed. This will require soil decompaction and reseeding of these disturbed areas. Previous CA was not completed.

Corrective Action

Comply with the 1003 interim reclamation rules.

Date \_\_\_\_\_

Overall Interim Reclamation Fail

**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: \_\_\_\_\_

Inspector Name: COSTA, RYAN

Corrective Action: <div style="border: 1px solid black; height: 20px; width: 600px;"></div>					Date <div style="border-bottom: 1px solid black; width: 100px;"></div>								
Overall Final Reclamation		Well Release on Active Location <input type="checkbox"/>		Multi-Well Location <input type="checkbox"/>									
<b>Storm Water:</b>													
Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment							
			Fail										
<div style="display: flex; justify-content: space-between;"><div>Comment: <div style="border: 1px solid black; padding: 5px; width: 80%;">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.</div></div><div>Date: <div style="border-bottom: 1px solid black; width: 100px;"></div></div></div> <div style="display: flex; justify-content: space-between; margin-top: 10px;"><div>Corrective Action: <div style="border: 1px solid black; padding: 2px; width: 600px;">Install or repair required BMPs per Rule 1002.f.(2)</div></div><div>Date: <div style="border-bottom: 1px solid black; width: 100px;"></div></div></div> <tr><td colspan="7"><b>Pits:</b>    <input checked="" type="checkbox"/> NO SURFACE INDICATION OF PIT</td></tr>							<b>Pits:</b> <input checked="" type="checkbox"/> NO SURFACE INDICATION OF PIT						
<b>Pits:</b> <input checked="" type="checkbox"/> 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
713602047	Inspection Photos	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7003676">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7003676</a>