

**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:

713602056**FIELD INSPECTION FORM**Loc ID 321658 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:6 Number of Comments5 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
ECMC Enforcement		dnr_ecmcenforcement@state.co.us	
GROWNS LARRY		lgrowns@willifordenergy.com	
Storts, Doug	(918) 495-2710	pds@willifordenergy.com	

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

LocationOverall 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. Since the previous inspection a form 27 has been submitted and it appears some samples were collected at the location. Further sampling and vertical and horizontal delineation will need to be completed. See form 27 Conditions of Approval for additional requirements.	
Corrective Action:	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 REVEGETATIONCropland

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:

<p>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 recontoured and reclaimed back to pre-existing conditions.</p>		
Corrective Action:	<p>Comply with 1004 Rules</p>	Date _____
Overall Final Reclamation	<p>Fail</p>	Well Release on Active Location <input type="checkbox"/> Multi-Well Location <input type="checkbox"/>

Storm Water:

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment
<p>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.</p>						
Corrective Action:						Date: _____
<p>Pits: <input checked="" type="checkbox"/> NO SURFACE INDICATION OF PIT</p>						

Attached Documents

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

Document Num	Description	URL
713602057	Inspection Photos	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7003679