

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

**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
- 5 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

**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. 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 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 recontoured and reclaimed back to pre-existing conditions.

Corrective Action:

Comply with 1004 Rules

Date \_\_\_\_\_

Overall Final Reclamation

Fail

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
713602057	Inspection Photos	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7003679">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7003679</a>