

**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 FORMLoc ID 321653 Inspector Name: COSTA, RYAN On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**

ECMC Operator Number: 96730

Name of Operator: WILLIFORD ENERGY COMPANY

Address: 6060 AMERICAN PLAZA SUITE 760

City: 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 Comments

7 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	
Sanchez, Chris		chris.sanchez@state.co.us	
ECMC Enforcement		dnr_ecmcenforcement@state.co.us	
GROWNS LARRY		lgrowns@willifordenergy.com	

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

Lease Road:			
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: ☐

Signs/Marker:			
Type	CONTAINERS		
Comment:	New label has been placed on the container.		
Corrective Action:		Date:	

Emergency Contact Number:

Comment:

Corrective Action:

Date: _____

Good Housekeeping:

Type	OTHER		
Comment:	The pumpjack engine has been replaced with an electric motor.		
Corrective Action:		Date:	
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

Overall Good: ☐

Spills:			
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:

☐ Multiple Spills and Releases?**Venting:**

Yes/No			
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Type			
Comment:			
Corrective Action:		Date:	

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

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: _____

Corrective Action:						Date		
Overall Final Reclamation		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		
			Fail					
Comment:		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.						
Corrective Action:		Install or repair required BMPs per Rule 1002.f.(2)					Date:	
Pits: <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
404163620	INSPECTION SUBMITTED	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7003686
713602047	Inspection Photos	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7003676