

**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:

713602058

FIELD INSPECTION FORM

Loc ID 321656 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:

- 9 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	
GROWNS LARRY		lgrowsns@willifordenergy.com	
Sanchez, Chris		chris.sanchez@state.co.us	
ECMC Enforcement		dnr_ecmcenforcement@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
207694	WELL	PR	11/01/2021	OW	017-06629	RHOADES UNIT 5-6	RI

General Comment:

This is a follow up of the previous inspections; #713600859, #713601091, #713601335, #713601839.
The corrective actions of the previous inspections have not been completed.
Non-compliance with the Rules will be referred to enforcement.
Operator is directed to perform corrective actions outlined on this inspection report immediately.

Location			
Lease Road:			
Type			
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. Repeated or flagrant instance(s) of failure to restrict lease access to lease roads which result in unreasonable land damage or crop losses shall be subject to a penalty under Rule 523.		
Corrective Action:	Operator shall abide by the reclamation rules to minimize surface disturbances per the 1002e rule.	Date:	
Overall Good: <input type="checkbox"/>			
Signs/Marker:			
Type	CONTAINERS		
Comment:	New label has been placed on the container.		
Corrective Action:		Date:	
Emergency Contact Number:			
Comment:	<input style="width: 100%;" type="text"/>		
Corrective Action:	<input style="width: 100%;" type="text"/>		Date: _____
Good Housekeeping:			
Type	TRASH		
Comment:	There is a pile of oily rags at the south and east side of the location that must be properly disposed. Previous CA was not completed.		
Corrective Action:	Comply with Rule 606 and dispose of all containers, rags, and trash.	Date:	
Type	OTHER		
Comment:	The secondary containment at the chemecial barrel has no wildlife protections/netting. Previous CA was not completed.		
Corrective Action:	Comply with Rule 902. Install or repair wildlife protection equipment.	Date:	
Overall Good: <input type="checkbox"/>			
Spills:			
Type	Area	Volume	
	WELLHEAD		
Comment:	The spill at the wellhead that was initially observed on 3/26/24 has not been cleaned up. There are still oil stained soils at the wellhead. Previous corrective action was not completed.		
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. Conduct maintenance on equipment, cleanup stained material and review self inspection processes.	Date:	
In Containment: No			
Comment:	<input style="width: 100%;" type="text"/>		
<input checked="" type="checkbox"/> Multiple Spills and Releases?			
Venting:			

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type			
Comment:			
Corrective Action:		Date:	

Environmental

Spill/Remediation:

Comment: A form 19 Supplemental was submitted on 12/3/2024 but no form 27 was submitted per COA's. It does not appear that any of the form 19 Conditions of Approval have been completed. The spill has not been cleaned up and the operator had spread sand over the spilled area to cover up impacted soils. Previous CA was not completed.

Corrective Action: **Comply with Rule 912.b. Comply with COA's of form 19 document #403977643.** Date: _____

Emission Control Burner (ECB): _____

Comment: _____

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

Reclamation - Storm Water - Pit

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 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 and culverts. The roads needs to be built up to allow stormwater drainage. Previous corrective action was not completed.

Corrective Action: Install or repair required BMPs per Rule 1002.f.(2)C

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
404163628	INSPECTION SUBMITTED	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7003692
713602059	Inspection Photos	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7003680