

**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:

05/13/2025

Submitted Date:

05/15/2025

Document Number:

713602167

**FIELD INSPECTION FORM**Loc ID 321654 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:**

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
207690	WELL	PR	10/19/1986	OW	017-06625	RHOADES UNIT 5-5	RI

**General Comment:**

This is a follow up of the previous inspections; #713600863, #713601093, #713601333, #713601827, #713602054.  
 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**

<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. 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: ☐

Emergency Contact Number:

Comment:		
Corrective Action:		Date: _____

Overall Good: ☐

<b>Spills:</b>				
Type	Area	Volume		
	Pump Jack			
Comment:	The leaking engine motor has been removed since the previous inspection. There is sand spread around the pumpjack to cover up the oil stained soils. The oil stained soils have not been cleaned up and properly disposed. Previous corrective action was not completed.			
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:
	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. There has been no form 19 spill report submitted to report the spill. Previous corrective action was not completed. It appears additional leaking at the well occurred. There is oily waste spread across the location and there are signs vehicles have driven over and tracked the oil stained soil. Stained soils have not been cleaned up. Previous CA was not completed.			
Corrective Action:	Control and contain spills/releases and clean up per Rule 912.a. Report spill or release of E&P waste or produced fluids Remove free fluids and contact EPS staff per Rule 912.b.			Date:

In Containment: No

Comment: ☒ Multiple Spills and Releases?**Venting:**

Yes/No			
Comment:			
Corrective Action:		Date:	

**Flaring:**

Type		
Comment:		
Corrective Action:		Date:

**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 burried 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: <input style="width: 90%;" type="text"/>	Date: <input style="width: 90%;" type="text"/>
Overall Final Reclamation <input type="checkbox"/>	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		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) 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
404206822	INSPECTION SUBMITTED	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7051838">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7051838</a>
713602168	Inspection Photos	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7051813">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7051813</a>