

**FORM
INSP**

Rev
X/20

**State of Colorado
Energy and Carbon Management Commission**

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



Inspection Date:

09/05/2025

Submitted Date:

09/10/2025

Document Number:

713602390

FIELD INSPECTION FORM

Loc ID 321653 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:

- 7 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
GROWNS LARRY		growns@willifordenergy.com	
Storts, Doug		pds@willifordenergy.com	
Chaivre, Annie		annie.chaivre@state.co.us	
Sanchez, Chris		chris.sanchez@state.co.us	

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. Previous CA was not completed.		
Corrective Action:	Operator shall abide by the reclamation rules to minimize surface disturbances per the 1002e rule.	Date:	

Overall Good:

Emergency Contact Number:			
Comment:	<input type="text"/>		
Corrective Action:	<input type="text"/>	Date:	<input type="text"/>

Good Housekeeping:			
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. Previous CA was not completed.		
Corrective Action:	Comply with Rule 902.b. Install or repair wildlife protection equipment.	Date:	

Overall Good:

Spills:			
Type	Area	Volume	
	Pump Jack		
Comment:	The leaking engine motor has been removed since the previous inspection. There is still stained soils at the base of the pumpjack that have not been cleaned up. Previous CA was not completed.		
Corrective Action:	Non E&P Waste not properly stored, handled, transported, treated, or disposed per Rule 906		Date: 09/10/2025

In Containment: No

Comment: The spill that was initially observed on 3/26/24 is being cleaned up under remediation project #39333. There has been excavation around the wellhead and the last form 27 update was received on 8/4/25. There still visually appears to be impacted soils at the location. See photo 11, 12. Additional sampling is required to fully delineate the vertical and lateral impacts to soil.

Multiple Spills and Releases?

Venting:			
Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:			
Type			
Comment:			
Corrective Action:		Date:	

Environmental

Waste Management:

Type	Management	Condition	GPS (Lat) (Long)	
Oily Soil	Piles	Inadequate	38.878420	-102.798320
Comment	The contaminated soil is stored on plastic but has no berms or containment and has spread off the plastic liner.			
Corrective Action	E&P Waste not properly stored, handled, transported, treated, recycled, or disposed per Rule 905.			Date: 09/12/2025

Spill/Remediation:

Comment:	A form 27 was submitted on 8/4/2025 which has Conditions of Approval for the remediation project. Comply with Rule 912.b. Comply with COA's of form 27 Remediation Workplan		
Corrective Action:			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

Comment: There are still areas of the access road that are not stabilized or maintained. There has been a road base material applied onto areas of the road however, this material has not been graded, crowned, or compacted. There is an area where stormwater is pooling and vehicles are driving around the impacted road causing disturbance. The access road needs to be repaired and maintained with BMP's installed per good engineering practice. Previous corrective action has not been 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
404349883	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7227348
713602391	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7227347