

**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:

09/15/2025

Document Number:

713602404

**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:**

- 7 Number of Comments
- 6 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	(918) 495-2710	pds@willifordenergy.com	
Growns, Larry		lgrowns@willifordenergy.com	
Sanchez, Chris		chris.sanchez@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 reclamation inspection of the RHOADES Unit #5-6 wellsite. The corrective action of the previous inspections have not been completed. 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. 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:	_____

**Good Housekeeping:**

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:

**Spills:**

Type	Area	Volume		
	Pump Jack			
Comment:	There are still oil stained soils where pumpjack engine was leaking. Previous CA 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:

In Containment: No  
 Comment: \_\_\_\_\_  
 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		
Comment	The contaminated soil is stored on plastic but there are containment and material has spread off the liner. The plastic liner was also torn and compromised.			
Corrective Action	E&P Waste not properly stored, handled, transported, treated, recycled, or disposed per Rule 905.			Date: 09/17/2025

**Spill/Remediation:**

Comment:	The spill at the wellhead that was initially observed on 3/26/24. A form 19 Supplemental was submitted on 12/3/2024 but no form 27 has been submitted. There has been excavation around the wellhead of impacted material.		
Corrective Action:	Operator shall File a Form 27-i Remediation Workplan in accordance with Rule 912.b.(6) for the transfer of Spill Facility ID(s) 486489	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
404353950	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7237023">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7237023</a>
713602405	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7236966">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=7236966</a>