

**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:

11/17/2025

Submitted Date:

11/20/2025

Document Number:

713602458

**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:**

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

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 has been excavation performed since the previous inspection however there are still visible oily impacts that remain. Remediation must continue to progress to clean up all impacts.			
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?

<b>Fencing/:</b>				
Type				
PUMP JACK				
Comment:	The fence around the pumpjack and excavated area has fallen over and there are cattle tracks inside the area which is a hazard if animals fall in the open excavation.			
Corrective Action:	Comply with the fencing requirements per the 1002a rules		Date:	11/20/2025

**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 has no berms or containment and has spread off the plastic liner. It appears impacted material has been spread further across the location. Previous CA was not addressed.			
Corrective Action	E&P Waste not properly stored, handled, transported, treated, recycled, or disposed per Rule 905.			Date: _____

**Spill/Remediation:**

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. Additional sampling is required to fully delineate the vertical and lateral impacts to soil. The quarterly reporting is now 15 days overdue. Remediation must continue to progress to clean up all impacts.		
Corrective Action:	Operator shall continue Quarterly Reporting until the Site Assessment is completed and the remediation area demonstrates Compliance with Table 915-1 Standards. Comply with Rule 912.b. Comply with COA's of form 27 Remediation Workplan.		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 has been a road base material applied onto areas of the road however, this material has not been graded, crowned, or compacted. The road base was not evenly spread and an area of the road has doubled in size. 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
404444259	INSPECTION SUBMITTED	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7341333">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7341333</a>
713602459	Inspection Photos	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7341332">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7341332</a>