

**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:

11/21/2025

Document Number:

713602466

FIELD INSPECTION FORM

Loc ID 321658 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:

- 5 Number of Comments
- 3 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
207697	WELL	SI	06/13/2024	GW	017-06632	RHOADES UNIT 5-7	RI

General Comment:

This is a follow up reclamation inspection of the RHOADES Unit #5-7 location. See attached photos and additional details within this report.

Environmental

Waste Management:

Type	Management	Condition	GPS (Lat) (Long)	
	Piles			
Comment	The E&P waste piles that were improperly stored have been removed. It appears there is still impacted remnants of the piles that remain including torn pieces of plastic liner. Further removal will need to occur followed by sampling confirmation.			
Corrective Action	E&P Waste not properly stored, handled, transported, treated, recycled, or disposed per Rule 905			Date: _____

Spill/Remediation:

Comment:	A form 27 was last submitted on 2/10/2025 and there has not been subsequent quarterly reporting provided. It is suspected that impacts extend further to the northwest and northeast portion of location due to darkened crusted material which may not be suitable for reclamation. Remediation must continue to progress to clean up all impacts.		
Corrective Action:	Control and contain spills/releases and clean up per Rule 912.a. Comply with Rule 912.b. and COA's of form 27 #404081128. Operator shall submit delinquent form(s) for this project.		Date: _____

Emission Control Burner (ECB): _____

Comment: _____

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

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

Corrective Action

Date _____

Overall Interim Reclamation

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 **Fail** Contoured **Fail** Culverts removed _____

Gravel removed _____

Location and associated production facilities reclaimed **Fail** Locations, facilities, roads, recontoured **Fail**

Compaction alleviation **Fail** Dust and erosion control _____

Non cropland: Revegetated 80% **Fail** 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: _____	Date _____					
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
Comment: There are areas along the access road where stormwater is pooling and vehicles are driving around the impacted road causing unnecessary disturbance. The access road was not maintained to prevent vehicle rutting and tracking. Since the well has been PA'd the access road will have to be reclaimed. The eroded areas of the road will require imported topsoil to adequately match the surrounding contours. All disturbed areas will need to be reclaimed and stabilized.						
Corrective Action: Install or repair required BMPs per Rule 1002.f.(2)						Date: _____
Pits: <input checked="" type="checkbox"/> 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
404446926	INSPECTION SUBMITTED	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7343826
713602467	Inspection Photos	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7343825