

**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:

11/26/2025

Document Number:

713602487

FIELD INSPECTION FORM

Loc ID 476137 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
Sanchez, Chris		chris.sanchez@state.co.us	
Storts, Doug	(918) 495-2710	pds@willifordenergy.com	
Growns, Larry		lgrowns@willifordenergy.com	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
476137	LOCATION	AC			-	RHOADES UNIT TUBING FLOWLINE 3213S48W	RI

General Comment:

This is a follow up inspection at the RHOADES UNIT Tank Battery Location #476137. See attached photos and additional details within this report.

Location

Overall Good:

Signs/Marker:

Type	BATTERY		
Comment:			
Corrective Action:		Date:	

Emergency Contact Number:

Comment:			
Corrective Action:		Date:	_____

Good Housekeeping:

Type			
Comment:	The tank that leaked crude oil at the south side of the facility had oily fluids that remain on the top of the tank. It did not appear that the tank was ever cleaned up. Previous CA was not completed.		
Corrective Action:	Comply with Rule 902.b.	Date:	

Overall Good:

Spills:

Type	Area	Volume		

In Containment: No

Comment: _____

Multiple Spills and Releases?

Fencing/:

Type	TANK BATTERY		
Comment:	The gate at the tank battery facility was left open and there are signs cattle had entered into the fenced area. The gates and fence must be maintained to prevent livestock entry.		
Corrective Action:	Comply with the fencing requirements per the 1002a rules.	Date:	11/28/2025

Venting:

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type			
Comment:			
Corrective Action:		Date:	

Environmental

Waste Management:

Type	Management	Condition	GPS (Lat)	(Long)
Oily Soil	Pits			
Comment	The pile of E&P waste has been removed from the north side of the tank battery facility.			
Corrective Action				Date:

Spill/Remediation:

Comment: Remediation #41129 does not appear to be progressing at the tank battery facility. The last form 27 report was received on 6/25/2025 and the quarterly report is now 62 days late. There are still oil-impacted material around the tanks at the north side of the facility. There also appears to be ongoing leaks at the south side tanks. Visible surface impacts have not been cleaned up.

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. and form 27 Conditions of Approval. Control and contain spills/releases and clean up per Rule 912.a.

Date: _____

Emission Control Burner (ECB): _____

Comment: _____

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

Attached Documents

You can go to ECMC Images (<https://ecmc.state.co.us/weblink/>) and search by document number:

Document Num	Description	URL
404453229	INSPECTION SUBMITTED	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7351117
713602488	Inspection Photos	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7351115