

**FORM  
INSP**Rev  
X/20**State of Colorado  
Oil and Gas Conservation Commission**1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109

Inspection Date:

03/26/2024

Submitted Date:

04/03/2024

Document Number:

713600890**FIELD INSPECTION FORM**Loc ID 476137 Inspector Name: COSTA, RYAN On-Site Inspection ☐ 2A Doc Num: \_\_\_\_\_**Operator Information:**OGCC Operator Number: 96730Name of Operator: WILLIFORD ENERGY COMPANYAddress: 6060 AMERICAN PLAZA SUITE 760City: TULSA State: OK Zip: 74135**Status Summary:**☐ THIS IS A FOLLOW UP INSPECTION☒ FOLLOW UP INSPECTION REQUIRED☐ NO FOLLOW UP INSPECTION REQUIRED**Findings:**4 Number of Comments3 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 |       | lgrowns@willifordenergy.com |         |
| Storts, Doug |       | pds@willifordenergy.com     |         |

**Inspected Facilities:**

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

**General Comment:**

This is a location inspection of the RHOADES UNIT Tank Battery.  
See attached photos and additional details within this report.

**Location**Overall Good: ☐**Signs/Marker:**

|                    |         |       |  |
|--------------------|---------|-------|--|
| Type               | BATTERY |       |  |
| Comment:           |         |       |  |
| Corrective Action: |         | Date: |  |

Emergency Contact Number:

|                    |  |             |
|--------------------|--|-------------|
| Comment:           |  | Date: _____ |
| Corrective Action: |  |             |

**Good Housekeeping:**

|                    |  |       |            |
|--------------------|--|-------|------------|
| Type               | DEBRIS   |       |            |
| Comment:           | There was some insulation debris and used rags laying on the ground that need to be removed. |       |            |
| Corrective Action: | Comply with Rule 606.  | Date: | 04/10/2024 |

Overall Good: ☐**Spills:**

|                    |   |        |  |                  |
|--------------------|---|--------|--|------------------|
| Type               | Area  | Volume |  |                  |
| Crude Oil          |   |        |  |                  |
| Comment:           | There was oily sludge at the truck loadout which has no secondary containment. There was oil stained soils around the tanks and shed that will need to be cleaned up. |        |  |                  |
| Corrective Action: | Control and contain spills/releases and clean up per Rule 912.a. Immediately to stop and clean up 24 hours to remove free fluids. 30-days to remove stained soil.     |        |  | Date: 05/03/2024 |

In Containment: No

Comment: ☒ Multiple Spills and Releases?**Tanks and Berms:**

|                    |   |          |      |         |        |       |
|--------------------|---|----------|------|---------|--------|-------|
| Contents           | # | Capacity | Type | Tank ID | SE GPS |       |
|                    |   |          |      |         |        |       |
| Comment:           |   |          |      |         |        |       |
| Corrective Action: |   |          |      |         |        | Date: |

**Paint**

|                  |  |  |
|------------------|--|--|
| Condition        |  |  |
| Other (Content)  |  |  |
| Other (Capacity) |  |  |
| Other (Type)     |  |  |

**Berms**

|                    |   |                     |                     |             |
|--------------------|---|---------------------|---------------------|-------------|
| Type               | Capacity  | Permeability (Wall) | Permeability (Base) | Maintenance |
| Earth              | Inadequate  | Walls Insufficient  |                     | Inadequate  |
| Comment:           | The berm at the southeast side of the location has eroded and must repaired. The berm at the northeast side is worn down and insufficient to contain a spill. |                     |                     |             |
| Corrective Action: | Repair or install berms or other secondary containment devices per Rule 603.o. Comply with 902.b for Pollution prevention.                                    |                     |                     |             |
|                    |   |                     | Date:               | 05/03/2024  |

Venting:

|                    |  |       |  |
|--------------------|--|-------|--|
| Yes/No             |  |       |  |
| Comment:           |  |       |  |
| Corrective Action: |  | Date: |  |

Flaring:

|                    |  |       |
|--------------------|--|-------|
| Type               |  |       |
| Comment:           |  |       |
| Corrective Action: |  | Date: |

Attached Documents

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

| Document Num | Description       | URL   |
|--------------|-------------------|---|
| 713600891    | Inspection Photos | <a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6492588">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6492588</a> |