

**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:

01/28/2025

Submitted Date:

01/29/2025

Document Number:

713601821

**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:**

- 9 Number of Comments
- 7 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
Enforcement		dnr_ecmcenforcement@state.co.us	
Sanchez, Chris		chris.sanchez@state.co.us	
Storts, Doug		pds@willifordenergy.com	
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; #713600861, #713601089, #713601331.  
The corrective actions of the previous inspections have not been completed.  
Non-compliance with the Rules will be referred to enforcement.  
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 are driving outside of the access road boundary causing unnecessary disturbance that will need to be reclaimed. 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. Vehicle tracks were observed outside of the access road boundary. Previous corrective action was not completed.	
	Corrective Action:	Operator shall abide by the reclamation rules to minimize surface disturbances per the 1002e rule.	Date:

Overall Good:

<b>Signs/Marker:</b>			
	Type	CONTAINERS	
	Comment:	The containers and barrels do not have proper labeling.	
	Corrective Action:	Install sign to comply with Rule 605.h.	Date:

Emergency Contact Number:

Comment:

Corrective Action:

Date: \_\_\_\_\_

<b>Good Housekeeping:</b>			
	Type	OTHER	
	Comment:	The pumpjack engine has been replaced with an electric motor.	
	Corrective Action:		Date:

Overall Good:

<b>Spills:</b>			
	Type	Area	Volume
	Crude Oil	WELLHEAD	
	Comment:	The spill that was initially observed on 3/26/24 has not been cleaned up. There was sand spread over the top of the spilled area to cover up the oil stained soils. Previous corrective action was not completed.	
	Corrective Action:	Control and contain spills/releases and clean up per Rule 912.a.	
			Date:
	Lube Oil	Pump Jack	
	Comment:	The leaking engine motor has been removed since the previous inspection. It is unknown if all stained soils were properly cleaned up by the pumpjack unit since there had been sand spread over this area.	
	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>Venting:</b>			
	Yes/No		
	Comment:		
	Corrective Action:		Date:

<b>Flaring:</b>			
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Type		
Comment:		
Corrective Action:		Date:

**Environmental**

**Spill/Remediation:**

Comment: A form 19 Supplemental was submitted on 11/21/2024 but no form 27 was submitted per COA's. It does not appear that any of the form 19 Conditions of Approval have been completed. The spill has not been cleaned up and the operator had spread sand over the spilled area to cover up impacted soils.

Corrective Action: **Comply with Rule 912.b.**  
**Comply with COA's of form 19 document #403977576 and #403977613.** 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 There has been new disturbance with the installation of the burried electric utility line. The disturbed soils will need to be seeded and stabilized before the upcoming growing season. Additionally all areas of disturbance where vehicles drove around the damaged access road will need to be reclaimed. This will require soil decompaction and reseeding of these disturbed areas.

Corrective Action Comply with the 1003 interim reclamation rules.

Date 03/15/2025

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 \_\_\_\_\_ Contoured \_\_\_\_\_ Culverts removed \_\_\_\_\_

Gravel removed \_\_\_\_\_

Location and associated production facilities reclaimed \_\_\_\_\_ Locations, facilities, roads, recontoured \_\_\_\_\_

Compaction alleviation \_\_\_\_\_ Dust and erosion control \_\_\_\_\_

Non cropland: Revegetated 80% \_\_\_\_\_ 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
	Fail		Fail	Material Handling And Spill Prevention	Fail	

Comment: There are areas of the 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, gravel, culverts, ect. There are also chemical barrels with no secondary containment not properly stored. Previous corrective action was not 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
713601822	Inspection photos	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6895320">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6895320</a>