

**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: **Operator Information:**ECMC 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:9 Number of Comments7 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

Lease Road:			
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: ☐

Signs/Marker:			
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: _____

Good Housekeeping:

Type	OTHER		
Comment:	The pumpjack engine has been replaced with an electric motor.		
Corrective Action:		Date:	

Overall Good: ☐

Spills:				
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?**Venting:**

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

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 REVEGETATIONCropland

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 buried 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		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:		<p>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</p>						
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
713601822	Inspection photos	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6895320