

**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:

02/03/2025

Document Number:

713601839**FIELD INSPECTION FORM**Loc ID 321656 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 Comments8 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		pds@willifordenergy.com	
GROWNS LARRY		lgrowns@willifordenergy.com	
Enforcement		dnr_ecmcenforcement@state.co.us	
Sanchez, Chris		chris.sanchez@state.co.us	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
207694	WELL	PR	11/01/2021	OW	017-06629	RHOADES UNIT 5-6	RI

**General Comment:**

This is a follow up of the previous inspections; #713600859, #713601091, #713601335.  
 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.

<b>Location</b>				
<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. 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: <input type="checkbox"/>				
<b>Signs/Marker:</b>				
	Type	TANK LABELS/PLACARDS		
	Comment:	There is no labeling of the barrels next to the wellhead.		
	Corrective Action:	Install sign to comply with Rule 605.h.	Date:	
Emergency Contact Number:				
	Comment:	<input type="text"/>		
	Corrective Action:	<input type="text"/>		Date: <input type="text"/>
<b>Good Housekeeping:</b>				
	Type	OTHER		
	Comment:	There was no oily fluid observed in the secondary containment at the chemecial barrel however no wildlife protections were installed.		
	Corrective Action:	Comply with Rule 902. Install or repair wildlife protection equipment.	Date:	
	Type	TRASH		
	Comment:	There is a pile of oily rags at the south side of the location that must be properly disposed. Previous CA was not completed.		
	Corrective Action:	Comply with Rule 606 and dispose of all containers, rags, and trash.	Date:	
Overall Good: <input type="checkbox"/>				
<b>Spills:</b>				
	Type	Area	Volume	
		WELLHEAD		
	Comment:	The spill at the wellhead that was initially observed on 3/26/24 has not been cleaned up. There are still oil stained soils at the wellhead. Previous corrective action was not completed.		
	Corrective Action:	Control and contain spills/releases and clean up per Rule 912.a.		Date:
		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:	<input type="text"/>		
<input type="checkbox"/> Multiple Spills and Releases?				
<b>Venting:</b>				
	Yes/No			

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

Environmental		
<b>Spill/Remediation:</b>		
Comment:	A form 19 Supplemental was submitted on 12/3/2024 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 #403977643.	Date: _____
Emission Control Burner (ECB): _____		
Comment:	_____	
Pilot: _____	Wildlife Protection Devices (fired vessels): _____	

**Reclamation - Storm Water - Pit****Storm Water:**

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment
<p>Comment: <span style="color: blue;">There are areas of 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 and culverts. The roads needs to be built up to allow stormwater drainage. Previous corrective action was not completed.</span></p> <p>Corrective Action: <span style="color: red;">Install or repair required BMPs per Rule 1002.f.(2)C</span> Date: _____</p> <p>Pits: <input checked="" type="checkbox"/> NO SURFACE INDICATION OF PIT</p>						

**Attached Documents**

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

Document Num	Description	URL
404078451	INSPECTION SUBMITTED	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6902165">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6902165</a>
713601840	Inspection Photos	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6902163">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6902163</a>