

**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:

05/13/2025

Submitted Date:

05/14/2025

Document Number:

713602153**FIELD INSPECTION FORM**Loc ID 476137 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:7 Number of Comments5 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	(918) 495-2710	pds@willifordenergy.com	
ECMC Enforcement		dnr_cogccenforcement@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
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.

LocationOverall Good: ☐**Signs/Marker:**

Type	TANK LABELS/PLACARDS		
Comment:	The tanks labels are missing and faded or inaccurate. No NFPA label on some of the tanks. Previous CA was not completed.		
Corrective Action:	Install sign to comply with Rule 605.h.	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 has oily fluids that remain on the top of the tank. The fluids are accessible to wildlife and need to be cleaned up and disposed immediately. Previous CA was not completed.		
Corrective Action:	Comply with Rule 902.b.	Date:	

Overall Good: ☐**Spills:**

Type	Area	Volume		
Crude Oil	Treater			
Comment:	A new spill occurred since the previous inspection. A form 19 (404190511) was provided indicating that the spill occurred on 5/5/2025. There was still puddled oil free fluids that remain at the spill area that requires immediate clean up. The operator was notified on the day of inspection.			
Corrective Action:	Comply with Rule 912.a.(2) Comply with form 19 (404190511) Conditions of Approval.			Date: 05/05/2025
Crude Oil	Tank			
Comment:	The inspection performed on 3/26/2024 observed oil stained soils around the tanks, shed, and also along the flowline going to the heater treater. A form 19 was submitted on 12/4/2024. The form 19 document #403977660 requires multiple Conditions of Approval which have not been completed. The impacted soils still remain at the tank battery facility and a new spill was identified on 1/28/2025 and no again during this inspection. Previous Corrective Action has not been completed.			
Corrective Action:	Control and contain spills/releases and clean up per Rule 912.a. Comply with Rule 912.b and form 19 (403977660) Conditions of Approval.			Date:

In Containment: No

Comment:

☐ Multiple Spills and Releases?**Venting:**

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type			
Comment:			
Corrective Action:		Date:	

Environmental**Waste Management:**

Type	Management	Condition	GPS (Lat) (Long)	
Oily Soil	Piles		38.878637	-102.814600
Comment	There is a pile of E&P waste material stored at the north side of the tank battery.			
Corrective Action				Date:

Spill/Remediation:

Comment: The previous spill that was observed on 1/28/25 has been reported with a form 19 submitted on 3/13/2025. There was a leak at the heater treater that spilled hydrocarbon mist along the west side berm. The spill flowed to the southeast corner of the location. There was also a condensate leak that occurred from the fiberglass tank and flowline shed. It appears this leak overtopped the berm at the southeast corner.
At the time of this inspection there were still stained impacted soils observed from the previous spills.

Corrective Action: Control and contain spills/releases and clean up per Rule 912.a.
Comply with Rule 912.b and form 19 (404124147) Conditions of Approval

Date: _____

Emission Control Burner (ECB): _____

Comment: _____

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

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

Document Num	Description	URL
713602154	Inspection Photos	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7048955