

**FORM
INSP**Rev
X/15**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:

12/19/2017

Submitted Date:

12/21/2017

Document Number:

689100109**FIELD INSPECTION FORM**Loc ID 391314 Inspector Name: LUJAN, CARLOS On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**OGCC Operator Number: 10119Name of Operator: MARALEX DISPOSAL LLCAddress: P O BOX 338City: IGNACIO State: CO Zip: 81137**Status Summary:**

- ☒ THIS IS A FOLLOW UP INSPECTION
- ☒ FOLLOW UP INSPECTION REQUIRED
- ☐ NO FOLLOW UP INSPECTION REQUIRED

Findings:8 Number of Comments1 Number of Corrective Actions☒ Corrective Action Response Requested**Contact Information:**

Contact Name	Phone	Email	Comment
Hall, Scott		shall@blm.gov	BLM, Grand Junction office
Reed, Jordan		maralextechjr@gmail.com	Maralex
Lujan, Carlos		carlos.lujan@state.co.us	EPS, NW Region
Fischer, Alex		alex.fischer@state.co.us	Environmental Supervisor, NW
Spencer, Stan		stan.spencer@state.co.us	EPS, NW Region
O'Hare, A. M.		amohare@maralexinc.com	Maralex

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
116525	PIT	AC			-	CENTRAL EVAPORATION PIT 1	EI

General Comment:

Inspection conducted on December 19, 2017. Sunny day, about 45 oF. On site with Alex Fischer and Stan Spencer from the COGCC.

- A stock pile of gravel was observed near the tank, outside of the fenced area.
- Tank is labeled, lined and fenced with some vegetation growth within the bermed area.
- The perimeter of the pit has been eroded and deep cuts are observed, particularly on the northwest and southeast sides of the pit. On the southeast, sediments from the erosion has been transported and deposited off the pad, southeast of the fence.
- The pit wall on the northeast side of the pit is damaged to the point that a section of about 30 feet long has been ripped. Liner was observed to be brittle with cracks and holes observed all along the northeast side. Some holes and patches were observed on the other three sides.
- Vegetation has grown on the perimeter of the pit and in the exposed section of the pit wall where the liner was torn.
- The pit is empty of fluids with a crust of white material (minerals, salt). Sediments and/or sludge was observed in the corners of the pit.

Inspected Facilities									
Facility ID:	116525	Type:	PIT	API Number:	-	Status:	AC	Insp. Status:	EI

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Environmental**Spills/Releases:**

Type of Spill: _____

Estimated Spill Volume: _____

Comment: On September 2014, Maralex conducted an electric survey and discovered about 14 leaks at the bottom of the pit (Doc #400711680). COGCC subsequently sampled the sediments deposited on the corners of the pit. TPH DRO concentrations of up to 50,000 mg/kg were reported (Doc #671000246). On October 13, 2015, COGCC conducted an inspection and requested from Maralex as a Condition of Approval (COA) that a Site Assessment (supplemental to REM #8494) be conducted to investigate potential impact beneath the liner (Insp #671000237). In December 2015, Maralex requested an extension to submit the Site Assessment. An extension was granted and the new deadline was set to December 21, 2015. The pit has been inactive for many years, which is a violation of Rule 1003b. When active, the pit operated as a multi-well pit. According to COGCC Rule 902e, multi-well pits are allowed to operate for three years and then must be closed via e-form 27 Site Assessment and Remediation Work Plan.

Corrective Action: 1) By January 31, 2018 Submit a Site Assessment Plan (supplemental e-form 27) providing a detail plan for closing Pit facility ID 116526. There should be a subsurface characterization with a focus in those areas of the compromised liner identified in the September 2014 electrical survey. The supplemental 27 shall include a schedule for completing the Pit Facility closure, remediation, and reclamation of the Location by August 31, 2018.

Date: 01/31/2018

Reportable: _____

GPS: Lat _____ Long _____

Proximity to Surface Water: _____

Depth to Ground Water: _____

Water Well Complaint:

Lat _____ Long _____

DWR Receipt Num: _____ Owner Name: _____ GPS : _____

Field Parameters:

Sample Location: _____ Comment: _____

COGCC Comments

Comment	User	Date
	lujanc	12/21/2017

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

Document Num	Description	URL
401493783	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4333157
689100110	Photo Report Maralex Roan Creek Evap Pit	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4333156