

**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:

06/20/2018

Submitted Date:

07/03/2018

Document Number:

681701030**FIELD INSPECTION FORM**Loc ID 391314 Inspector Name: Arauza, Steven 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:4 Number of Comments1 Number of Corrective Actions

- ☒
- Corrective Action Response Requested

Contact Information:

Contact Name	Phone	Email	Comment
O'Hare, Mickey	(970) 563-4000/ (719) 429-3529	amohare@maralexinc.com	All Inspections
Fischer, Alex		alex.fischer@state.co.us	
Tahmahkera, Kerry		MaralexTech@gmail.com	Production Technician
Werkmeister, Wayne		wwerkmeister@blm.gov	
Hall, Scott		shall@blm.gov	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
433509	CENTRALIZED EP WASTE MGMT FAC	XX	07/08/2013		-	Roan Creek Evaporation Pit 116525	EI
443917	SPILL OR RELEASE	AC	11/12/2015		-	SPILL/RELEASE POINT	EI

General Comment:

COGCC Environmental Inspection of Centralized E&P Waste Management Facility. Remediation Project #8494 and Spill ID #443917 remain active. Site conditions have not improved since February 9, 2018 Field Inspection (doc #689100119). It appears that no work has been performed by operator in response to previous FIRs. Berms remain eroded with off-site sediment transport as well as evidence of sediment and fluid transport into lined pit. Patches and holes in liner observed across perimeter of pit, including a ~30' area in NE corner of pit where a portion of the liner is now completely missing. Vegetation growth remains along fenceline, on top of earthen berm, and inside of unlined area at NE corner of pit.

December 19, 2017 Field Inspection Report (doc #689100109) included a Corrective Action deadline of January 31, 2018 for operator to submit a supplemental eForm 27 Site Investigation and Remediation Workplan for pit closure to be completed no later than August 31, 2018. To date, operator has not submitted the required supplemental eForm 27.

Operator shall immediately submit eForm 27 Site Investigation and Remediation Workplan that outlines detailed plan for pit closure.

Inspected Facilities							
Facility ID:	<u>433509</u>	Type:	<u>CENTRALIZE</u>	API Number:	<u>-</u>	Status: <u>XX</u>	Insp. Status: <u>EI</u>
Facility ID:	<u>443917</u>	Type:	<u>SPILL OR</u>	API Number:	<u>-</u>	Status: <u>AC</u>	Insp. Status: <u>EI</u>

Environmental**Spill/Remediation:**

Comment: Spill/Release Point ID #443917 remains active. Operator has not provided any updates regarding the historical release or remediation since filing the initial Spill Report (doc #400933708) on November 10, 2015. Remediation Project #8494 remains active with no update from the operator since December 22, 2015.

Corrective Action: Immediately submit Supplemental eForm 19 Spill/Release Report and Supplemental eForm 27 Site Investigation and Remediation Workplan to COGCC.

Date: 11/19/2015

Emission Control Burner (ECB): _____

Comment: _____

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

Attached Documents

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

Document Num	Description	URL
401693083	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4512984
681701033	Field photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4512983