

**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:

09/27/2019

Submitted Date:

09/30/2019

Document Number:

692401383

**FIELD INSPECTION FORM**
 Loc ID 430698 Inspector Name: Colby, Lou On-Site Inspection ☐ 2A Doc Num:
**Operator Information:**

OGCC Operator Number: 53255

Name of Operator: MARALEX RESOURCES INC

Address: P O BOX 338

City: IGNACIO State: CO Zip: 81137

**Status Summary:**

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

**Findings:**

12 Number of Comments

9 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
Ohare, Mickey	970-563-4000	amohare@maralexinc.com	
Graves, Jim	970-712-0099	mrinc20@qwestoffice.net	
Heil, John		john.heil@state.co.us	
		dnr_cogccenforcement@state.co.us	
Jordan, Reid	970-563-4000	maralextechjr@gmail.com	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
430697	GAS COMPRESSOR STATION	AC	11/01/2012		-	Compressor	RI

**General Comment:**

This Inspection is being referred to enforcement; it is being entered for notification and documentation only (CA Dates have not been entered or back dated as appropriate) and is not intended to provide the Operator the opportunity to resolve the alleged violations without the imposition of a penalty, pursuant to Rule 522.c.(1). Operator is directed to perform corrective actions outlined on this inspection report immediately.

This is an Interim Reclamation & Stormwater focused Inspection, a Follow Up to Insp Doc#692400006 Dated 7/31/18. Any Corrective Actions from previous Inspections that have not been addressed are still applicable. CAs at site have not been resolved and several new issues were identified in this Inspection.

**Location**Overall Good: ☐

Emergency Contact Number:

Comment: Tank sign is missing Capacity &amp; Contents.

Corrective Action: Install sign to comply with Rule 210.d.

Date: 12/10/2018

**Good Housekeeping:**

Type	DEBRIS		
Comment:	Weeds are growing in and around equipment on site. In area by risers and outside of Tank berm it appears mature weeds have been cut off, left on site & become Debris. Any weeds (living or dead) growing within 25 feet of any production equipment are considered Debris/fire hazard and need to be removed.		
Corrective Action:	Remove weeds living or dead at least 25 feet from equipment and any weeds that have the potential to break off, or are cut off & will become debris from location.	Date:	09/27/2018
Type	STORAGE OF SUPL		
Comment:	Supplies not stored in safe or workman like manner. Two boxes of what is identified as Antifreeze are stored on ground behind compressor along sound wall straw bales.		
Corrective Action:	Comply with Rule 603.f	Date:	

Overall Good: ☐**Spills:**

Type	Area	Volume		
Other				
Comment:	Stock tank used for containment of day tanks holds what appears to be water topped with heavy scum of unknown oily waste liquid. Operator was contacted by phone call at 2:15 PM September 30th with notice to immediately remove free fluids from stock tank. Operator employee, identified as Jim Graves said that they would not respond to request.			
Corrective Action:	There are three CAs in this section. 1) Remove free fluids immediately. 2) Install or repair wildlife protection equipment. 3) Securely fasten all valves, pipes, and fittings to ensure good mechanical condition, inspect at regular intervals and maintain in good mechanical condition per Rule 605.d.			Date:
Other				
Comment:	Multiple areas of staining at compressor equipment area. Tank appears stained with overflow and staining outside tank berm.			
Corrective Action:	Properly treat or dispose of stained soil & remedy any mechanical conditions that allowed leak / spill. Contact NW EPS, John Heil immediately for CAs/ procedures required.			Date: 12/01/2018

In Containment: No

Comment:

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

Type: Other	#		corrective date
Comment:	Sound Wall/Barrier is constructed of Straw bales a combustible material; and Installed tightly around compressor equipment. Bales at top level of Wall are out of position.		
Corrective Action:	Move Sound wall back to seventy-five feet from equipment. Operator encouraged to resolve CA ASAP as extreme dry conditions have led to high level fire safety concerns in area.		
Date:	12/10/2018		
Type: Other	#		
Comment:	Gaps in netted panel that covers stock tank used for fluid storage from separator unit, allows ingress of smaller Wildlife.		
Corrective Action:	Net or fence tank to prevent access by wildlife.		
Date:	08/24/2018		



Inspected Facilities									
Facility ID:	430697	Type:	GAS	API Number:	-	Status:	AC	Insp. Status:	RI

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**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 \_\_\_\_\_

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 [Weed Debris is addressed in Location Housekeeping section.](#)

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? **Fail**

Production areas have been stabilized? \_\_\_\_\_ Segregated soils have been replaced? \_\_\_\_\_

**RESTORATION AND REVEGETATION**Cropland

Top soil replaced \_\_\_\_\_ Recontoured \_\_\_\_\_ Perennial forage re-established \_\_\_\_\_

Non-Cropland

Top soil replaced \_\_\_\_\_ Recontoured \_\_\_\_\_ 80% Revegetation **Fail**

## 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? **F**

Comment

Majority of Vegetation within Interim Reclamation Area is Russian thistle, Kochia, Marsh elder & Poverty sumpweed, that are not acceptable Vegetative cover. Dense canopy and competitive proclivities of these species have severely limited establishment of desirable perennial species. Noxious weeds, Russian knapweed, Bull thistle & Bindweed were also noted on location.

Corrective Action

There are two CAs in this Section.  
**CA#1) Control Noxious weeds & weeds that are preventing establishment of desirable species in Interim Rec area by 10/1/18; consulting Garfield County Vegetation Manager for most effective controls & timing of applications.**  
**CA#2) Vegetate currently weed dominated and sparsely vegetated areas of Location with desirable species to reach 80% of Reference area requirement. Reclamation activities should be complete by November 30,2018.**

Date **10/01/2018**Overall Interim Reclamation **Fail****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 ☐Multi-Well Location ☐**Storm Water:**

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment

Comment: [Site appeared stable at time of inspection.](#)

Corrective Action: \_\_\_\_\_

Date: \_\_\_\_\_

**Pits:** ☐ NO SURFACE INDICATION OF PIT

Type: \_\_\_\_\_ Lined: \_\_\_\_\_ Pit ID: \_\_\_\_\_ Lat: \_\_\_\_\_ Long: \_\_\_\_\_

Reference Point: \_\_\_\_\_ Other: \_\_\_\_\_ Length: \_\_\_\_\_ Width: \_\_\_\_\_

**Lining:**

Liner Type: \_\_\_\_\_ Liner Condition: \_\_\_\_\_

Comment: [Remains of shallow pit hidden in weeds at East side of site has heavily impacted soil; sample delivered to EPS. Refer to Photo log attached.](#)Corrective [Contact NW EPS, John Heil immediately for CAs/ procedures required.](#)

Date: \_\_\_\_\_

**Fencing:**

Fencing Type: \_\_\_\_\_ Fencing Condition: \_\_\_\_\_

Comment: \_\_\_\_\_

Corrective \_\_\_\_\_

Date: \_\_\_\_\_

**Netting:**

Netting Type: \_\_\_\_\_ Netting Condition: \_\_\_\_\_

Comment: \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date: \_\_\_\_\_

Anchor Trench Present: \_\_\_\_\_ Oil Accumulation: \_\_\_\_\_ 2+ feet Freeboard: \_\_\_\_\_

Comment: \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date: \_\_\_\_\_

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

Document Num	Description	URL
692401384	Inspection Photos RI	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4951132">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4951132</a>