

State of Colorado
Energy & Carbon Management Commission

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06/07/2024

Report taken by:
Jason Kosola

Site Investigation and Remediation Workplan (Supplemental Form)

This form shall be submitted to the Director for approval prior to the initiation of site investigation and remediation activities. However, this shall not preclude the Operator from taking immediate action to protect public health or safety, the environment, wildlife, or livestock.

This Form 27 describes site conditions as currently understood by the Operator; approval of this Form 27 by ECMC is based on the site conditions accurately described herein; any changes in site conditions identified during or subsequent to the performance of the approved workplan may necessitate additional investigation or remediation which shall be described on a supplemental Form 27. This Form 27 is intended to provide basic information regarding the proposed site investigation and remediation actions, but the workplan may be more fully described in attached documentation.

Closure request is not available for an Initial Site Investigation and Remediation Workplan.

OPERATOR INFORMATION

Name of Operator: <u>MARALEX RESOURCES INC</u>	Operator No: <u>53255</u>	Phone Numbers Phone: <u>(970) 563-4000</u> Mobile: <u>()</u>
Address: <u>P O BOX 338</u>		
City: <u>IGNACIO</u>	State: <u>CO</u>	Zip: <u>81137</u>
Contact Person: <u>MOLLIE O'HARE</u>	Email: <u>mollieo@maralexinc.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 33421 Initial Form 27 Document #: 403573005

PURPOSE INFORMATION

- Rule 913.c.(1): Pit or Cuttings Trench closure.
- Rule 913.c.(2): Buried or partially buried vessel closure, which will be by removal.
- Rule 913.c.(3): Remediation of Spill and Releases pursuant to Rule 912.
- Rule 913.c.(4): Land treatment of Oily Waste pursuant to Rule 905.e.
- Rule 913.c.(5): Closure of Centralized E&P Waste Management Facilities pursuant to Rule 907.h.
- Rule 913.c.(6): Remediation of impacted Groundwater pursuant to Rule 915.e.(3).D, and the contaminant concentrations in Table 915-1.
- Rule 913.c.(7): Investigation and remediation of natural gas in soil or Groundwater.
- Rule 913.c.(8): When requested by the Director due to any potential risk to soil, Groundwater, or surface water.
- Rule 913.c.(9): Decommissioning of Oil and Gas Facilities.
- Rule 913.g: Changes of Operator.
- Rule 915.b: Request to leave elevated inorganics in situ.
- Other: _____

SITE INFORMATION

Yes Multiple Facilities

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>485052</u>	API #: _____	County Name: <u>LA PLATA</u>
Facility Name: <u>Tanks</u>	Latitude: <u>37.136735</u>	Longitude: <u>-107.571685</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NENE</u>	Sec: <u>2</u>	Twp: <u>33n</u>	Range: <u>7w</u> Meridian: <u>N</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>485053</u>	API #: _____	County Name: <u>LA PLATA</u>
Facility Name: <u>Drilling Site (mouse hole/rat hole)</u>	Latitude: <u>37.137217</u>	Longitude: <u>-107.571556</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>NENE</u>	Sec: <u>2</u>	Twp: <u>33N</u>	Range: <u>7W</u> Meridian: <u>N</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications GM _____

Most Sensitive Adjacent Land Use Crop Land _____

Is domestic water well within 1/4 mile? No _____

Is surface water within 1/4 mile? Yes _____

Is groundwater less than 20 feet below ground surface? No _____

Other Potential Receptors within 1/4 mile

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- | | | |
|--|--|--|
| <input checked="" type="checkbox"/> E&P Waste | <input type="checkbox"/> Other E&P Waste | <input checked="" type="checkbox"/> Non-E&P Waste |
| <input type="checkbox"/> Produced Water | <input type="checkbox"/> Workover Fluids | Fresh water/oily soil _____ |
| <input type="checkbox"/> Oil | <input type="checkbox"/> Tank Bottoms | |
| <input type="checkbox"/> Condensate | <input type="checkbox"/> Pigging Waste | |
| <input type="checkbox"/> Drilling Fluids | <input type="checkbox"/> Rig Wash | |
| <input checked="" type="checkbox"/> Drill Cuttings | <input type="checkbox"/> Spent Filters | |
| | <input type="checkbox"/> Pit Bottoms | |
| | <input type="checkbox"/> Other (as described by EPA) _____ | |

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
No	SOILS	NONE	Samples
No	SURFACE WATER	NONE	Samples

INITIAL ACTION SUMMARY

Description of initial action or emergency response measures take to abate, investigate, and/or remediate impacts associated with E&P Waste.

Bermed the tanks and stopped the leak.

PROPOSED SAMPLING PLAN

Proposed Soil Sampling

Will soil samples be collected as part of this investigation? (Number, type (grab/composite), analyses, and locations of samples):

2 samples at 8-12" have been taken as indicated in the previously approved Soil Sample Map. When those sample results have been received, they will be communicated in a Form 27S.

Less than a bbl of fresh water (as proven by water analysis) was spilled from tank. ECMC was concerned that the water mixed with a coagulant. If the water actually did mix with the coagulant, scientifically it would not have penetrated the surface. Therefore, once the soil on the pad (including what was under the tanks) has been scraped, the remaining soil will not have been negatively impacted.

Proposed Groundwater Sampling

Will groundwater samples be collected as part of this investigation? (Number, analyses, and locations of samples):

Proposed Surface Water Sampling

Will surface water samples be collected as part of this investigation? (Number, analyses, and locations of samples):

1 water sample was taken below the site.

Additional Investigative Actions

Additional alternative investigative actions described in attached Site Investigation Plan (summary):

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil	NA / ND
Number of soil samples collected <u>2</u>	Highest concentration of TPH (mg/kg) _____

Number of soil samples exceeding 915-1 0

Highest concentration of SAR _____

Was the areal and vertical extent of soil contamination delineated? _____

BTEX > 915-1 _____

Approximate areal extent (square feet) 0

Vertical Extent > 915-1 (in feet) 1

Groundwater

Number of groundwater samples collected 0

Highest concentration of Benzene (µg/l) _____

Was extent of groundwater contaminated delineated? No

Highest concentration of Toluene (µg/l) _____

Depth to groundwater (below ground surface, in feet) _____

Highest concentration of Ethylbenzene (µg/l) _____

Number of groundwater monitoring wells installed _____

Highest concentration of Xylene (µg/l) _____

Number of groundwater samples exceeding 915-1 _____

Highest concentration of Methane (mg/l) _____

Surface Water

1 Number of surface water samples collected

0 Number of surface water samples exceeding 915-1

If surface water is impacted, other agency notification may be required.

OTHER INVESTIGATION INFORMATION

Were impacts to adjacent property or offsite impacts identified?

Were background samples collected as part of this site investigation?

1 background sample will be taken if current samples exceed the Table 915-1. Results will be communicated when samples results are received from lab.

Was investigation derived waste (IDW) generated as part of this investigation?

Volume of solid waste (cubic yards) _____

Volume of liquid waste (barrels) _____

Is further site investigation required?

REMEDIAL ACTION PLAN

Does this Supplemental Form 27A include changes to a previously approved Remedial Action Plan? No

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Tanks have been removed from location. Mouse Hole and Rat Hole were impacted with fresh water when the pump that was used to pump the water to drill failed. Once the well has been completed, Maralex intends to scrape contaminated soil off the top of the location and appropriately dispose of that soil. If stained soil remains, that soil will be removed as well.

REMEDIATION SUMMARY

Describe how remediation of existing impacts to soil and groundwater is to be accomplished (i.e. summarize remedial action plan). Provide a brief narrative description including: technical justification, schedule for implementation, estimated time to attain NFA status, plus plans and specifications for the selected remedial action technology.

Discrete samples were taken from location as described in sample plan at a depth of 8". Water Sample was taken from pond below the location.
Once the well has been completed, Maralex intends to scrape contaminated soil off the top of the location and appropriately dispose of that soil. If stained soil remains, that soil will be removed as well.
The three initial sample results will be submitted when they are received from the lab. These samples are indicative of the areas that were impacted by the spill from the drilling operation. If they come back without exceedances, this will indicate that Maralex has effectively remediated the spill and did not affect waters of the state.
The site is still an active well site. The drilling activities have concluded and the new well is in the process of being completed. The well site will soon be turned back to operations and be maintained and operated as an active well site.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)
_____ Chemical oxidation
_____ Air sparge / Soil vapor extraction
_____ Natural Attenuation
_____ Other _____

_____ Excavate and offsite disposal
_____ If Yes: Estimated Volume (Cubic Yards) _____
_____ Name of Licensed Disposal Facility or ECMC Facility ID # _____
_____ Excavate and onsite remediation
_____ Land Treatment
_____ Bioremediation (or enhanced bioremediation)
_____ Chemical oxidation
_____ Other _____

Groundwater Remediation Summary

_____ Bioremediation (or enhanced bioremediation)
_____ Chemical oxidation
_____ Air sparge / Soil vapor extraction
_____ Natural Attenuation
_____ Other _____

GROUNDWATER MONITORING

If groundwater has been impacted, describe proposed monitoring plan, including # of wells or sample points, monitoring schedule, analytical methods, points of compliance. Attach a groundwater monitoring location diagram.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Approved Reporting Schedule:

Quarterly Semi-Annually Annually Other

Request Alternative Reporting Schedule:

Semi-Annually Annually Other

Rule 913.e:

After initial approval of a Form 27, the Operator will provide quarterly update reports in a Supplemental Form 27 to document progress of site investigation and remediation, unless an alternative reporting schedule has been requested by the Operator and approved by the Director. The Director may request a more frequent reporting schedule based on site-specific conditions.

Report Type: Groundwater Monitoring Land Treatment Progress Report O&M Report
 Other _____

Adequacy of Operator's General Liability Insurance and Financial Assurance

Describe the adequacy of the Operator's general liability insurance and Financial Assurance to fully address the anticipated costs of Remediation, including the estimated remaining cost for this project (below).
If this information has been provided on a Form 27 within the last 12 months, provide the Document Number of that form.

Operator has adequate financial assurance to address the anticipated costs of remediation.

Operator anticipates the remaining cost for this project to be: \$ 3000 _____

WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? _____

Describe beneficial use, if any, of E&P Waste derived from this remediation project:

Volume of E&P Waste (solid) in cubic yards _____

E&P waste (solid) description _____

ECMC Disposal Facility ID #, if applicable: _____

Non-ECMC Disposal Facility: _____

Volume of E&P Waste (liquid) in barrels _____

E&P waste (liquid) description _____

ECMC Disposal Facility ID #, if applicable: _____

Non-ECMC Disposal Facility: _____

REMEDIATION COMPLETION REPORT

REMEDIATION COMPLETION SUMMARY

Is this a Final Closure Request for this Remediation Project? No _____

If YES:

- Compliant with Rule 913.h.(1).
- Compliant with Rule 913.h.(2).
- Compliant with Rule 913.h.(3).

Do all soils meet Table 915-1 standards? _____

Does the previous reply indicate consideration of background concentrations? _____

Does Groundwater meet Table 915-1 standards? _____

Is additional groundwater monitoring to be conducted? _____

Operator shall comply with the ECMC 1000-Series Reclamation Requirements for all impacted and disturbed areas.

RECLAMATION PLAN

RECLAMATION PLANNING

Describe reclamation plan. Discuss existing and new grade recontouring; method and testing of compaction alleviation; and reseeding program, including location of new seed, seed mix and noxious weed prevention. Attach diagram or drawing.

no reclamation needed as this is an active location.

Is the described reclamation complete? _____

Does the reclamation described herein constitute interim or final reclamation of the Oil and Gas Location?

Interim

Final

Did the Surface Owner provide the seed mix? _____

If YES, does the seed mix comply with local soil conservation district recommendations? _____

Did the local soil conservation district provide the seed mix? _____

SITE RECLAMATION DATES

Proposed date of commencement of Reclamation. _____

Proposed date of completion of Reclamation. _____

IMPLEMENTATION SCHEDULE

Per Rule 913.d.(2): Any change from the approved implementation schedule will be requested at least 14 days in advance, and the Operator may not make the change without the Director's approval.

PRIOR DATES

Date of Surface Owner notification/consultation, if required. 08/24/2023

Actual Spill or Release date, or date of discovery. 08/18/2023

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 08/25/2023

Proposed site investigation commencement. 08/25/2023

Proposed completion of site investigation. 10/25/2023

REMEDIAL ACTION DATES

Proposed start date of Remediation. _____

Proposed date of completion of Remediation. _____

Per Rule 913.d.(2): Any change from the approved implementation schedule will be requested at least 14 days in advance, and the Operator may not make the change without the Director's approval.

Change from approved implementation schedule per Rule 913.d.(2).

Basis for change in implementation schedule:

OPERATOR COMMENT

Attached are soil and water samples and water analysis that prove these spills did not affect, nor harm in any way the health, safety, welfare of anything, anyone, nor the environment. We have removed the contaminated soil and are requesting closure on all spills on the well location of the Mollie Corynne 2A and the Mollie Corynne 3C.

As noted in other reports and in my email discussion and phone conversation with Jason Kosola on May 17th and after, Maralex thought it had submitted for closure on this item in 2023. It appears there was a clerical error, either on the ECMC website or on Maralex' end, but two soil samples and one ground water sample were taken in 2023, as initially mapped out in our original Form 27. Those sample results are attached here.

Again, to restate, we did not know until now that an additional Form 27S needed to be filed, as we thought we had filed for closure in 2023.

Not having heard back from the ECMC since we had a hearing to discuss the NOAV last fall, we thought this issue, as well as the NOAV was resolved. ECMC field staff admitted they did not update their contact lists for us after we asked them to so it is possible we have not been receiving information on this matter from them. We have respectfully requested they refer to the Form 1's and 1A's when assembling their contact lists as operators have no way of knowing when turn-over happens at the ECMC and operators are required to update the Form 1 and Form 1A when there is turnover at the operator-level. We hope to collaborate more smoothly with the field staff going forward.

Thank you.

I hereby certify all statements made in this form are to the best of my knowledge true, correct, and complete.

Signed: MOLLIE O'HARE

Title: E.A.

Submit Date: 06/07/2024

Email: mollieo@maralexinc.com

Based on the information provided herein, this Application for Site Investigation and Remediation Workplan complies with ECMC Rules and applicable orders and is hereby approved.

ECMC Approved: Jason Kosola

Date: 06/12/2024

Remediation Project Number: 33421

COA Type

Description

	<p>ECMC removed closure request. Remediation does not meet minimum requirements for closure.</p> <p>Operator has not complied with COA's on previously approved forms.</p> <p>-Operator must demonstrate areas previously observed to be impacted on wellpad are compliant with Table 915-1</p> <p>-Operator shall submit analytical results summary table.</p> <p>-Operator shall submit map identifying all sample locations including background sample locations.</p> <p>-Inadequate sample points. Operator shall comply with COA's on previously approved forms discussing requirement for additional sample locations.</p>
1 COA	

ATTACHMENT LIST

Upon approval, the approved Form 27 and all listed attachments will be indexed to the Remediation Project file. Only the approved Form 27 will also be indexed to the related Facilities.

Att Doc Num

Name

403797815	FORM 27-SUPPLEMENTAL-SUBMITTED
403797816	PHOTO DOCUMENTATION
403817205	ANALYTICAL RESULTS
403817209	ANALYTICAL RESULTS
403817229	ANALYTICAL RESULTS
403817252	MAP

Total Attach: 6 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	This Form 27 does not meet minimum requirements for quarterly update. No analytical results are attached.	05/30/2024
Environmental	Operator stated no changes to form were possible. Email sent on 5/21/2024 inquiring if operator had turned the edit switch on each tab on. No response received. Additional email sent on 5/30/2024	05/30/2024

Total: 2 comment(s)