

## Maralex Roan Creek Evaporation Pond July 18, 2013

## Joint inspection: Maralex, COGCC and BLM

Pond is currently under temporary suspension. Maralex is in the process of obtaining a COGCC permit for this facility, which is required since the 2009 Colorado State Rule changes.

COGCC has several items that will need to be addressed before they will issue a permit:

Noted rocks and debris inside pond, on liner. Woody vegetation/any vegetation along the edge of the line must be removed and kept away from liner to prevent impacts the liner integrity. Rules state a 10 foot buffer is needed for the liner and another 10 foot buffer from the edge of the facility boundary, for mitigating fire hazard. Potential 20 foot buffer from liner (10' no-veg at liner adjacent to 10' mowed grass strip) would meet the total buffer needed and allow for vegetation on the pond slopes. COGCC stated this would require approval of a variance but it was likely to be sufficient.

Approximately 60 patches noted in the pond liner on the northeast side of pond. COGCC will require the liner to be replaced before the facility is permitted. Liner is approximately 15 years old and is rated to function for 20 years. Maralex would like to continue using the liner unless a problem is detected (leak detection system). COGCC stated any disagreements with these decisions can be appealed with the COGCC board/commissioner.

COGCC will require proper runoff control. BLM notes the reclamation work that was started is not rough enough to prevent erosion. Early stages of erosion are already evident at this visit.

BLM has a requirement to increase the bond but the bond amount has not yet been determined. Estimates for complete site reclamation including potential contamination are between \$250,000 and \$750,000. Maralex emailed BLM another estimate they obtained for \$120,000. The bond amount will be decided by Grand Junction Field Manager soon using all the available information.

Maralex will continue to work on obtaining the COGCC site permit.

The Temporary Use Area permitted for the bioremediation project is no longer in use and will need to be reclaimed. Due to the site location, BLM recommends surface roughening and seeding to be done this fall. This authorization expires December 31, 2013. The reclamation must be successful for BLM to fully relinquish Maralex responsibility for this site, which will occur after vegetation success can be ascertained.

C. Ventling

Maralee Ryan CK Erap pond - 7-18-13

**Meeting Attendees:**

[illegible]