FORM
27
Rev 6/99

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State of Colorado
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203 (303)894-2100 Fax:(303)894-2109

#8165

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1/6/2014

OGCC Employee:

☐ Spill ☐ Complaint
☐ Inspection ☐ NOAV

Tracking No:

SITE INVESTIGATION AND REMEDIATION WORKPLAN

This form shall be submitted to the Director for approval prior to the initiation of site investigation and remediation activities. Form 27 is intended to be used whenever possible. Additional documentation will be required when large volumes of soil and groundwater have been impacted or involve large facilities with multiple source areas. See Rule 910. Attach as many pages as needed to fully describe the proposed work.

CAUSE OF CONDITION BEING INVESTIGATED AND REMEDIATED

☐ Spill or Release ☐ Plug & Abandon ☐ Central Facility Closure ☐ Site/Facility Closure ☑ Other (describe): Pit Closure

OGCC Operator Number: 53255
Name of Operator: Maralex Resources, Inc.
Address: P.O. Box 338
City: Ignacio, State: CO Zip: 81137

Contact Name and Telephone:
Naomi Azulai and Jim Graves
No: (970) 563-4000
Fax: (970) 563-4116

API Number:
County: Mesa
Facility Name: Roan Creek Federal 25-3
Facility Number: Lease No. COC-52677
Well Name: N/A
Well Number:
Location: (QtrQtr, Sec, Twp, Rng, Meridian): SE/SW SEC. 25, Township 8 South, Range 98 West Latitude: 39.32433 Longitude: 108.281114

TECHNICAL CONDITIONS

Type of Waste Causing Impact (crude oil, condensate, produced water, etc): Calcium Chloride

Site Conditions: Is location within a sensitive area (according to Rule 901e)? ☐ Y ☑ N If yes, attach evaluation.

Adjacent land use (cultivated, irrigated, dry land farming, industrial, residential, etc.): non-cropland - undeveloped

Soil type, if not previously identified on Form 2A or Federal Surface Use Plan: Colluvium - clayed sand w/ gravel and cobbles.

Potential receptors (water wells within 1/4 mi, surface waters, etc.):

Description of Impact (if previously provided, refer to that form or document):

Impacted Media (check):	Extent of Impact:	How Determined:
☐ Soils	Surface soils @ bottom of pit(s)	laboratory analysis
☐ Vegetation	sparse grass and weeds adjacent to pit	visual
☐ Groundwater	N/A - GW was not observed in the pit	to a max. excavatecd depth of 6' BGS
☐ Surface Water	N/A - evidence or stormwater was observed in	the Separator Pit

REMEDIATION WORKPLAN

Describe initial action taken (if previously provided, refer to that form or document):

Characteization soil samples were obtainded from both the Calcium Chloride and Separator Pits on April 25, 2013. The samples were analyzed for and compared to the COGCC Table 910-1 Concentration Levels.Evidence of petroleum hydrocarbon contamination was not indicated at either the Calcium Chloride or the Separator Pits.

Describe how source is to be removed:

No source removal appears to be necessary at this time.
Based on the reported laboratory data the soil, at both the Calcium Chloride Pit and the Separator Pit met the COGCC Table 910-1 Concentration Levels with the following exceptions:

• Boron was reported at 13.6 and 9.7 mg/Kg in the Calcium Chloride Pit and the Separator Pit, respectively. The concentrations exceed the COGCC's Concentration Level of 2 mg/L.

Describe how remediation of existing impacts is to be accomplished, including removal and disposal at an injection well or licensed facility, land treatment on site, removal of impacted groundwater, insitu bioremediation, burning of oily vegetation, etc.:

• Arsenic concentrations from samples obtained at the pits and from the undisturbed location were reported at 0.9, 0.8, 1.4, 1.2 and 1.1 mg/Kg respectively, and exceed the COGCC standard of 0.39 mg/Kg. We believe the reported Arsenic concentrations of represent background. Based on our experience, soils in Colorado commonly fail the State's standards for Arsenic.
• A Sodium Adsorption Ratio was reported in the Separator Pit at 107 and exceeds the COGCC Concentration of <12. Calcium, Magnesium and Sodium were reported at 0.44, 0.12, and 56.5 meq/L. No soil remediation is proposed at this time.

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