

**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:

09/27/2018

Submitted Date:

10/09/2018

Document Number:

681701097**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
Ferrin, Jeremy		jeremy.ferrin@state.co.us	
Fischer, Alex		alex.fischer@state.co.us	
Hall, Scott		shall@blm.gov	
,	970-563-4000	maralextech@gmail.com	All Inspections
,		dnr_cogccenforcement@state.co.us	
Spencer, Stan		stan.spencer@state.co.us	
O'Hare, Mickey	(970) 563-4000/ (719) 429-3529	amohare@maralexinc.com	All Inspections

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
116525	PIT	AC			-	CENTRAL EVAPORATION PIT 1	EI
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 joint Environmental inspection of Centralized E&P Waste Management Facility with S. Hall of BLM, follow-up to Environmental field inspection report (doc #681701030). Remediation Project #8494 and Spill ID #443917 remain active. Site conditions have not improved since October 13, 2015 Field Inspection (doc #671000237). It appears that no work has been performed by operator in response to previous FIRs.

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.

The following conditions were observed during COGCC/BLM inspection (See attached field photos):

- Pit located within 200' of mapped surface water feature (Coon Hollow)
- Evidence of erosion, stormwater runoff, and off-site sediment transport from pit berms in all cardinal directions which lead into stormwater channel west of pit and toward Coon Hollow east of pit.
- Over 60 holes (some repaired, others open) were observed in visible portion of liner, mostly along north side of pit, in addition to ~30' section in NE corner of pit where liner has been torn off and rolled back into place without being repaired.
- 40 mil pit liner, installed in 1998 (doc #400711670), was stiff and brittle on inspection date. Remediation Project #8494 and Spill ID #443917 document suspected liner leaks along pit bottom and associated subsurface impacts.
- Surface of pit remains covered in salt and sediment.
- Evidence of stormwater runoff and sediment transport into pit and anchor trench in multiple low berm areas (NW corner and SW corner).
- Vegetated stockpiles of unidentified soil and gravel remain at SW corner of pit, outside of fence. BLM records indicate that this area may have been subject to land treatment/bioremediation.
- Site-wide vegetation growth (along fenceline, along tank berm, along anchor trench, and in damaged section of pit liner at NE corner of pit).
- Stormwater channel running along NW side of fence line and vegetated soil stockpiles to north of pit.
- NE corner of fence has been patched, barbed wire remains cut.
- Berm for 300 bbl produced water pit is shallow and eroded.

Inspected Facilities									
Facility ID:	116525	Type:	PIT	API Number:	-	Status:	AC	Insp. Status:	EI
Facility ID:	433509	Type:	CENTRALIZE	API Number:	-	Status:	XX	Insp. Status:	EI
Facility ID:	443917	Type:	SPILL OR	API Number:	-	Status:	AC	Insp. Status:	EI

Environmental**Spill/Remediation:**

Comment: Per previous inspection report: 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: Previous environmental FIRs, most recently dated 6/20/2018 (doc #681701030) instructed operator to submit supplemental reports for Spill/Release ID #443917 and Remediation Project #8494. To date, operator has not submitted required supplemental reports.

Date: _____

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
681701100	20180927 Field Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4602969