



STATE OF
COLORADO

doc #1727864
Location ID #312507
Remediation Project #8165

Arauza - DNR, Steven <steven.arauza@state.co.us>

Maralex pit closure

Arauza - DNR, Steven <steven.arauza@state.co.us>

Thu, Jan 6, 2022 at 1:27 PM

To: "Crockett, Allen B" <acrocket@blm.gov>

Cc: "Toews, Wesley J" <wtoews@blm.gov>, "Jones, Douglas J" <d3jones@blm.gov>, "Byers, James C" <jbyers@blm.gov>, "Woolley, Carmia E" <cwoolley@blm.gov>

Copy that, Wes. I do not foresee a need to reopen the investigation at this time, in light of the fact that the pits were closed under a Form 27 previously. If there is any reason to suspect residual impacts or revegetation issues associated with the pits, we can revisit this matter at a later date.

Thank you for looking into this one so quickly.

Steven J. Arauza, P.G.

Environmental Protection Specialist



COLORADO

**Oil & Gas Conservation
Commission**

Department of Natural Resources

P 303.894.2100, ext. 5689 | C 720.498.5298

818 Taughenbaugh Blvd, Suite 103, Rifle, CO 81650

steven.arauza@state.co.us | www.colorado.gov/cogcc

He/Him

On Thu, Jan 6, 2022 at 10:56 AM Crockett, Allen B <acrocket@blm.gov> wrote:

Good work, Sherlock.

Allen B. Crockett, Ph.D.

Supervisory Natural Resource Specialist

BLM Colorado River Valley Field Office

970-876-9005 (office), 970-274-9780 (mobile)

From: Toews, Wesley J <wtoews@blm.gov>

Sent: Thursday, January 6, 2022 10:54 AM

To: Arauza - DNR, Steven <steven.arauza@state.co.us>

Cc: Jones, Douglas J <d3jones@blm.gov>; Byers, James C <jbyers@blm.gov>; Woolley, Carmia E <cwoolley@blm.gov>; Crockett, Allen B <acrocket@blm.gov>

Subject: Re: [EXTERNAL] Maralex pit closure

Stephen,

After review of our records we have do documentation of the BLM's approval of the pit closure in 2014. Based on our approval and COGCC's F27 approval of the pit closure with a COA stating that the pit should be covered by at least 3' of clean soil during interim reclamation, we don't see any reason to revisit this pit as the landowner. Let me know if you want to discuss further.

Thanks,

Wesley Toews

Natural Resource Specialist

Colorado River Valley Field Office
Bureau of Land Management
2300 River Frontage Road
Silt, Colorado 81652
Main: 970.876.9000
Direct: 970.876.9067
Cell: 970.319.5683

From: Arauza - DNR, Steven <steven.arauza@state.co.us>

Sent: Tuesday, January 4, 2022 3:03 PM

To: Toews, Wesley J <wtoews@blm.gov>

Cc: Jones, Douglas J <d3jones@blm.gov>; Freitag, Lindsey M <lfreitag@blm.gov>; Byers, James C <jbyers@blm.gov>; Woolley, Carmia E <cwoolley@blm.gov>

Subject: Re: [EXTERNAL] Maralex pit closure

Thank you, Wes.

I have also attached a BLM correspondence from the Remediation Project File and a letter report regarding the pit sampling event.

Steven J. Arauza, P.G.
Environmental Protection Specialist



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He/Him

On Tue, Jan 4, 2022 at 2:44 PM Toews, Wesley J <wtoews@blm.gov> wrote:

Steven,

Doug and I will review our well files, discuss internally, and get back to you on this issue.

Thanks,

Wesley Toews

Natural Resource Specialist

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From: Arauza - DNR, Steven <steven.arauza@state.co.us>

Sent: Tuesday, January 4, 2022 2:40 PM

To: Jones, Douglas J <d3jones@blm.gov>; Toews, Wesley J <wtoews@blm.gov>

Subject: [EXTERNAL] Maralex pit closure

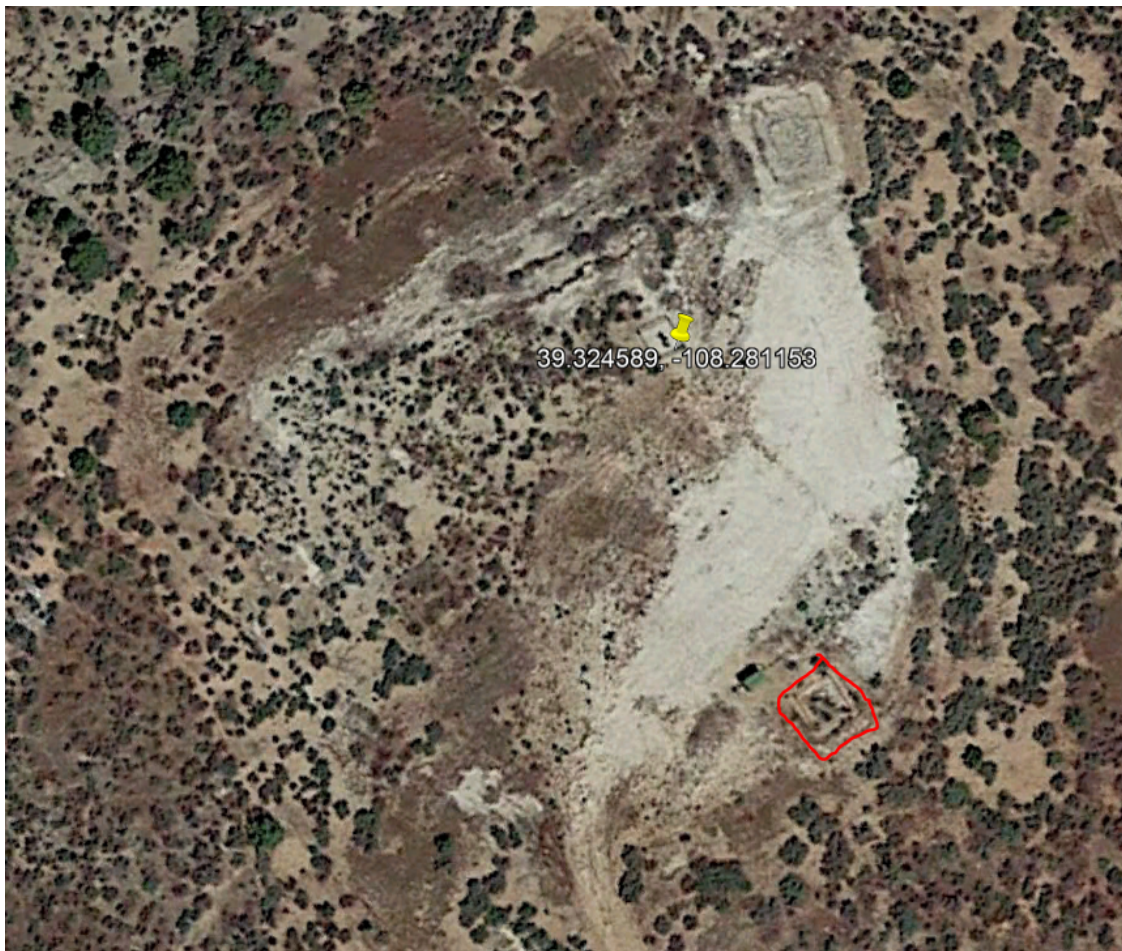
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Doug and Wes,

I have received a Form 27 for P&A of the Federal #25-3 well (API #05-077-08410) by Maralex Resources Inc. The well is located in SESW Sec. 25 T-8-S R-98-W.

COGCC records indicate that there were two pits closed on the pad in 2014 under COGCC Remediation Project Number 8165, although analytical data for the Separator Pit indicates a Sodium Adsorption Ratio of 107, as well as conductance of 5.4 mmhos/cm and a pH of 9.6--all exceeding COGCC Table 910-1 (doc #2147409 is attached as Roan Creek Fed 25-3.pdf). Given the magnitude of this SAR exceedance, I am considering a condition of approval for Maralex to investigate the documented inorganics exceedances at this former pit location.

I can not find any records of these pits in the COGCC database, they do not appear to have COGCC permits or facility IDs associated with them. Below is a Google Earth aerial from 2014 depicting the pit locations. I have circled the Separator Pit in question.



- As the surface owner, does BLM have any interest in reopening the investigation into this Separator Pit, given the past analytical results?
- Has any distressed vegetation been observed on this pad?
- Does BLM have any record of the pits in operation or of pit closure?

Feel free to give me a call or send an email if you'd like any additional information. This is an unusual situation.

Steven J. Arauza, P.G.
Environmental Protection Specialist



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