

FORM  
INSPRev  
X/20

## State of Colorado Oil and Gas Conservation Commission

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Phone: (303) 894-2100 Fax: (303) 894-2109



Inspection Date:

03/02/2022

Submitted Date:

03/04/2022

Document Number:

696203461

### FIELD INSPECTION FORM

Loc ID 312658 Inspector Name: Trujillo, Aaron On-Site Inspection  2A Doc Num: \_\_\_\_\_

**Operator Information:**

OGCC Operator Number: 53255  
Name of Operator: MARALEX RESOURCES INC  
Address: P O BOX 338  
City: IGNACIO State: CO Zip: 81137

**Status Summary:**

- THIS IS A FOLLOW UP INSPECTION  
 FOLLOW UP INSPECTION REQUIRED  
 NO FOLLOW UP INSPECTION REQUIRED

**Findings:**

- 8 Number of Comments  
6 Number of Corrective Actions  
 Corrective Action Response Requested

**ANY CORRECTIVE ACTION(S) FROM  
PREVIOUS INSPECTIONS THAT HAVE NOT  
BEEN ADDRESSED ARE STILL APPLICABLE**

**Contact Information:**

Contact Name	Phone	Email	Comment
Longworth, Mike		michael.longworth@state.co.us	
		amo@maralexinc.com	
		dnr_cogccenforcement@state.co.us	
		anna.omalley@state.co.us	
		mrinc20@maralexinc.com	
Byers, Jim		jbyers@blm.gov	Mesa, Garfield, Gunnison

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
222099	WELL	PR	09/09/1997	GW	077-08701	SULFUR GULCH 9-98-1 1	RI
312658	LOCATION	AC			-	SULFUR GULCH 9-98-1-69S98W 1SWNE	RI

**General Comment:**

On 3/2/2022, Reclamation Specialist Trujillo inspected Maralex Resources Inc's SULFUR GULCH 9-98-1 #1 location in Mesa County, Colorado

It was observed in this inspection that the following corrective actions required per inspection Nos. 701101775 and 699802242 have not been addressed and remain applicable:

- Tank signage missing
- Sign at wellhead illegible
- Weeds on Location and around equipment
- Stormwater (tracking, erosion).

New compliance issues observed during this inspection:

- Surface disturbance minimization
- Good housekeeping / trash debris
- Inadequate secondary containment

Refer to the "Location", "Reclamation" and "Stormwater" sections of this inspection report for additional details.

Refer to the photo-documentation of the observed compliance issues attached to this report.

Any corrective action(s) from previous inspections that have not been addressed are still applicable.

A follow up inspection on this site will be conducted to ensure the compliance issues have been corrected to comply with COGCC rules.

<b>Location</b>			
Overall Good: <input type="checkbox"/>			
<b>Signs/Marker:</b>			
Type	WELLHEAD		
Comment:	Inspection #701101775 observed that the well sign is illegible. Inspection required Operator to install sign to comply with Rule 605.d.  It was observed in this inspection that the well sign remains inadequate. CA has not been addressed and remains applicable.		
Corrective Action:	Install sign to comply with Rule 605.d.	Date:	11/04/2021
Type	TANK LABELS/PLACARDS		
Comment:	Inspection #701101775 observed that the capacity label on the tank is blank. Inspection required Operator to Install sign to comply with Rule 605.h.  It was observed in this inspection that the capacity label on the tank remains blank. CA has not been addressed and remains applicable.		
Corrective Action:	Install sign to comply with Rule 605.h.	Date:	11/04/2021
<b>Emergency Contact Number:</b>			
Comment:	<input style="width: 100%;" type="text"/>		
Corrective Action:	<input style="width: 100%;" type="text"/>		Date: _____
<b>Good Housekeeping:</b>			
Type	WEEDS		
Comment:	Inspection #701101775 observed weeds on the Location and around equipment. Inspection required Operator to comply with Rule 606.  It was observed in this inspection that weeds remain on the Location (well, tank battery, equipment); noxious weeds (Halogeton) evident; weed management inadequate. CA has not been addressed and remains applicable.		
Corrective Action:	Comply with Rule 606	Date:	08/20/2021
Type	TRASH		
Comment:	Trash observed dumped on the south end of the Location.		
Corrective Action:	Comply with Rule 606.	Date:	03/11/2022
Overall Good: <input type="checkbox"/>			
<b>Spills:</b>			
Type	Area	Volume	
In Containment: No			
Comment:	<input style="width: 100%;" type="text"/>		
<input type="checkbox"/> Multiple Spills and Releases?			
<b>Venting:</b>			
Yes/No			
Comment:			
Corrective Action:			Date:
<b>Flaring:</b>			
Type			
Comment:			

Corrective Action:

Date:

**Inspected Facilities**

Facility ID: 222099 Type: WELL API Number: 077-08701 Status: PR Insp. Status: RI

Facility ID: 312658 Type: LOCATION API Number: - Status: AC Insp. Status: RI

**Reclamation - Storm Water - Pit**

**Interim Reclamation:**

Date Interim Reclamation Started: \_\_\_\_\_ Date Interim Reclamation Completed: \_\_\_\_\_

Land Use: \_\_\_\_\_

Comment: \_\_\_\_\_

**1002 SITE PREPARATION AND STABILIZATION**

1002a. FENCING \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1002b. SOIL REMOVAL AND \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1002c. PROTECTION OF SOILS \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1002E. SURFACE DISTURBANCE MINIMIZATION \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1003a. Waste and Debris removed? \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

Unused or unneeded equipment onsite? \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

Pit, cellars, rat holes and other bores closed? \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

Guy line anchors marked? \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1003b. Area no longer in use? \_\_\_\_\_ Production areas stabilized ? \_\_\_\_\_  
 1003c. Compacted areas have been cross ripped? \_\_\_\_\_  
 1003d. Drilling pit closed? \_\_\_\_\_ Subsidence over on drill pit? \_\_\_\_\_  
 Cuttings management: \_\_\_\_\_  
 1003e. Areas no longer needed for drilling or subsequent operations for have been re-vegetated to 80% of pre-existing? \_\_\_\_\_  
 Production areas have been stabilized? \_\_\_\_\_ Segregated soils have been replaced? \_\_\_\_\_

RESTORATION AND REVEGETATION

Cropland

Top soil replaced \_\_\_\_\_ Recontoured \_\_\_\_\_ Perennial forage re-established \_\_\_\_\_

Non-Cropland

Top soil replaced \_\_\_\_\_ Recontoured \_\_\_\_\_ 80% Revegetation \_\_\_\_\_

1003e. INTERIM VEGETATION TRANSECT  
 TRANSECT RESULTS OF DISTURBED AREA% \_\_\_\_\_  
 TRANSECT RESULTS OF REFERENCE AREA% \_\_\_\_\_  
 TOTAL % OF DESIRABLE VEGETATION COVER \_\_\_\_\_  
 VEGETATIVE COVER \_\_\_\_\_

1003 f. Weeds Noxious weeds? \_\_\_\_\_ F \_\_\_\_\_

Comment Vehicle tracks observed traveling off site from the northwestern end of the pad, traveling north to V 2/10 Road. Operator has failed to minimize surface disturbances and restrict vehicle traffic only to their Location and access road.

Corrective Action Comply with 1002.e and restrict travel to the production areas and designated access roads. Conduct reclamation on off-location areas impacted due to vehicle travel from the Location.

Date 05/30/2022

Overall Interim Reclamation

**Final Reclamation/ Abandoned Location:**

Date Final Reclamation Started: \_\_\_\_\_ Date Final Reclamation Completed: \_\_\_\_\_

Final Land Use: \_\_\_\_\_

Reminder: \_\_\_\_\_

Comment: \_\_\_\_\_

Well plugged \_\_\_\_\_ Pit mouse/rat holes, cellars backfilled \_\_\_\_\_

Debris removed \_\_\_\_\_ No disturbance /Location never built \_\_\_\_\_

Access Roads Regraded \_\_\_\_\_ Contoured \_\_\_\_\_ Culverts removed \_\_\_\_\_

Gravel removed \_\_\_\_\_

Location and associated production facilities reclaimed \_\_\_\_\_ Locations, facilities, roads, recontoured \_\_\_\_\_

Compaction alleviation \_\_\_\_\_ Dust and erosion control \_\_\_\_\_

Non cropland: Revegetated 80% \_\_\_\_\_ Cropland: perennial forage \_\_\_\_\_

Weeds present \_\_\_\_\_ Subsidence \_\_\_\_\_

1004.d. FINAL VEGETATION TRANSECT  
 TRANSECT RESULTS OF DISTURBED AREA% \_\_\_\_\_  
 TRANSECT RESULTS OF REFERENCE AREA% \_\_\_\_\_  
 TOTAL % OF DESIRABLE VEGETATION COVER \_\_\_\_\_  
 VEGETATIVE COVER \_\_\_\_\_

Comment: \_\_\_\_\_

Corrective Action: \_\_\_\_\_

Date \_\_\_\_\_

Overall Final Reclamation \_\_\_\_\_ Well Release on Active Location  Multi-Well Location

**Storm Water:**

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment

**Comment:** Inspection #701101775 observed erosion degradation on the Location, and off-site sediment transport. Inspection required Operator to comply with 1002.f.

It was observed in this inspection that control measures to minimize erosion degradation and manage runoff remain missing or insufficient.

It was also observed that control measures to stabilize the production areas, and minimize/mitigate tracking and offsite sediment transport are missing or insufficient. Additionally the secondary containment BMP at the tank battery is inadequate; containment BMP appears insufficient in size to contain spill from tank; berm at the containment is no longer consolidated and in proper functioning condition.

**Corrective Action:** Original CA and date has not been addressed and remains applicable.

Comply with Rule 1002.f: Oil and gas operators shall implement and maintain Best Management Practices (BMPs) at all oil and gas locations.

Date: 12/20/2020

**Pits:**  NO SURFACE INDICATION OF PIT

**Attached Documents**

You can go to COGCC Images (<https://cogcc.state.co.us/weblink/>) and search by document number:

Document Num	Description	URL
696203462	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5682398">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5682398</a>