

State of Colorado
Oil and Gas Conservation Commission

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403267814
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12/21/2022
Report taken by:
Jason Kosola

Site Investigation and Remediation Workplan (Supplemental Form)

This form shall be submitted to the Director for approval prior to the initiation of site investigation and remediation activities. However, this shall not preclude the Operator from taking immediate action to protect public health or safety, the environment, wildlife, or livestock.

This Form 27 describes site conditions as currently understood by the Operator; approval of this Form 27 by COGCC is based on the site conditions accurately described herein; any changes in site conditions identified during or subsequent to the performance of the approved workplan may necessitate additional investigation or remediation which shall be described on a supplemental Form 27. This Form 27 is intended to provide basic information regarding the proposed site investigation and remediation actions, but the workplan may be more fully described in attached documentation.

Closure request is not available for an Initial Site Investigation and Remediation Workplan.

OPERATOR INFORMATION

Name of Operator: <u>MARALEX RESOURCES INC</u>	Operator No: <u>53255</u>	Phone Numbers Phone: <u>(970) 563-4000</u> Mobile: <u>(303) 918-9466</u>
Address: <u>P O BOX 338</u>		
City: <u>IGNACIO</u>	State: <u>CO</u>	Zip: <u>81137</u>
Contact Person: <u>Phoebe Bechtolt</u>	Email: <u>pbechtolt@maralexinc.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 8841 Initial Form 27 Document #: 1642186

PURPOSE INFORMATION

- Rule 913.c.(1): Pit or Cuttings Trench closure.
- Rule 913.c.(2): Buried or partially buried vessel closure, which will be by removal.
- Rule 913.c.(3): Remediation of Spill and Releases pursuant to Rule 912.
- Rule 913.c.(4): Land treatment of Oily Waste pursuant to Rule 905.e.
- Rule 913.c.(5): Closure of Centralized E&P Waste Management Facilities pursuant to Rule 907.h.
- Rule 913.c.(6): Remediation of impacted Groundwater pursuant to Rule 915.e.(3).D, and the contaminant concentrations in Table 915-1.
- Rule 913.c.(7): Investigation and remediation of natural gas in soil or Groundwater.
- Rule 913.c.(8): When requested by the Director due to any potential risk to soil, Groundwater, or surface water.
- Rule 913.c.(9): Decommissioning of Oil and Gas Facilities.
- Rule 913.g: Changes of Operator.
- Rule 915.b: Request to leave elevated inorganics in situ.
- Other: Pit Closure

SITE INFORMATION

No Multiple Facilities

Facility Type: <u>LOCATION</u>	Facility ID: <u>311960</u>	API #: _____	County Name: <u>LA PLATA</u>
Facility Name: <u>KATIE EILEEN 34-7-35-M34N7W 35SWSE</u>		Latitude: <u>37.142683</u>	Longitude: <u>-107.574168</u>
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWSE</u>	Sec: <u>35</u>	Twp: <u>34N</u>	Range: <u>7W</u> Meridian: <u>M</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications CH Most Sensitive Adjacent Land Use NON CROP LAND
Is domestic water well within 1/4 mile? Yes Is surface water within 1/4 mile? Yes
Is groundwater less than 20 feet below ground surface? Yes

Other Potential Receptors within 1/4 mile

170' from Spring Creek

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- E&P Waste
- Produced Water
- Oil
- Condensate
- Drilling Fluids
- Drill Cuttings
- Other E&P Waste
- Workover Fluids
- Tank Bottoms
- Pigging Waste
- Rig Wash
- Spent Filters
- Pit Bottoms
- Other (as described by EPA)
- Non-E&P Waste
Plastic

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
	SOILS	Inside Pit	COGCC

INITIAL ACTION SUMMARY

Description of initial action or emergency response measures take to abate, investigate, and/or remediate impacts associated with E&P Waste.

The State has inspected and analyzed the contents of the pit with four samples. The pit was not closed upon well completion because the landowner resumed control of the pit. The plan that is proposed in this form is filed under protest. Maralex acknowledges that it does not have jurisdiction and on behalf of the landowner is not conceding that the COGCC has jurisdiction over the pit. Maralex intends on appealing COGCC Order Finding Violation No. 1V-489, based on the fact that Maralex has never acquired or owned any interest or had control over the pit on this site. The proposed plan is imposed by the COGCC. This pit has been used since 2007 by the landowner for watering livestock.

PROPOSED SAMPLING PLAN

Proposed Soil Sampling

Will soil samples be collected as part of this investigation? (Number, type (grab/composite), analyses, and locations of samples):

Please find the proposed sampling maps attached.

The pit will have four samples from the sidewalls and base per the Form 27S. There will also be one background sample collected. The background sample can be used for both projects.

Proposed Groundwater Sampling

Will groundwater samples be collected as part of this investigation? (Number, analyses, and locations of samples):

[Empty box for groundwater sampling details]

Proposed Surface Water Sampling

Will surface water samples be collected as part of this investigation? (Number, analyses, and locations of samples):

[Empty box for surface water sampling details]

Additional Investigative Actions

Additional alternative investigative actions described in attached Site Investigation Plan (summary):

[Empty box for additional investigative actions]

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 4
Number of soil samples exceeding 915-1 0
Was the areal and vertical extent of soil contamination delineated? _____
Approximate areal extent (square feet) 0

NA / ND

_____ Highest concentration of TPH (mg/kg) _____
_____ Highest concentration of SAR _____
BTEX > 915-1 _____
Vertical Extent > 915-1 (in feet) 0

Groundwater

Number of groundwater samples collected 0
Was extent of groundwater contaminated delineated? No
Depth to groundwater (below ground surface, in feet) _____
Number of groundwater monitoring wells installed 0
Number of groundwater samples exceeding 915-1 0

_____ Highest concentration of Benzene (µg/l) _____
_____ Highest concentration of Toluene (µg/l) _____
_____ Highest concentration of Ethylbenzene (µg/l) _____
_____ Highest concentration of Xylene (µg/l) _____
_____ Highest concentration of Methane (mg/l) _____

Surface Water

0 Number of surface water samples collected
0 Number of surface water samples exceeding 915-1
If surface water is impacted, other agency notification may be required.

OTHER INVESTIGATION INFORMATION

Were impacts to adjacent property or offsite impacts identified?

Were background samples collected as part of this site investigation?

Was investigation derived waste (IDW) generated as part of this investigation?

Volume of solid waste (cubic yards) _____ Volume of liquid waste (barrels) _____

Is further site investigation required?

The soils in the pit will be analyzed by taking discrete soil samples from the bottom and sidewalls of the pit to verify that they do not exceed Table 915-1 constituent limits. In addition, the results of the testing that the COGCC conducted on the pit contents will be compared to background values and Table 915-1 parameters in order to characterize the contents of the pit. The COGCC will be given 48 hour notice of sampling.

REMEDIAL ACTION PLAN

Does this Supplemental Form 27A include changes to a previously approved Remedial Action Plan? No

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

The fluids in the pit will be allowed to evaporate or be consumed by landowners' livestock.

REMEDIATION SUMMARY

Describe how remediation of existing impacts to soil and groundwater is to be accomplished (i.e. summarize remedial action plan). Provide a brief narrative description including: technical justification, schedule for implementation, estimated time to attain NFA status, plus plans and specifications for the selected remedial action technology.

Research will be done to find out the outcome of the rule challenge.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)

_____ Excavate and offsite disposal

_____ Chemical oxidation
_____ Air sparge / Soil vapor extraction
_____ Natural Attenuation
_____ Other _____

If Yes: Estimated Volume (Cubic Yards) _____
Name of Licensed Disposal Facility or COGCC Facility ID # _____
_____ Excavate and onsite remediation
_____ Land Treatment
_____ Bioremediation (or enhanced bioremediation)
_____ Chemical oxidation
_____ Other _____

Groundwater Remediation Summary

_____ Bioremediation (or enhanced bioremediation)
_____ Chemical oxidation
_____ Air sparge / Soil vapor extraction
_____ Natural Attenuation
_____ Other _____

GROUNDWATER MONITORING

If groundwater has been impacted, describe proposed monitoring plan, including # of wells or sample points, monitoring schedule, analytical methods, points of compliance. Attach a groundwater monitoring location diagram.

It is not believed groundwater or surface water is impacted; however, a sensitive area determination will be conducted and submitted to the COGCC assessing possible impacts that may have affected the surface or ground water. If impacts are identified then a supplemental Form 27 will be submitted with a plan to fully investigate and remediate the impacts.

REMEDIATION PROGRESS UPDATE

PERIODIC REPORTING

Approved Reporting Schedule:

Quarterly Semi-Annually Annually Other

Request Alternative Reporting Schedule:

Semi-Annually Annually Other

Rule 913.e:

After initial approval of a Form 27, the Operator will provide quarterly update reports in a Supplemental Form 27 to document progress of site investigation and remediation, unless an alternative reporting schedule has been requested by the Operator and approved by the Director. The Director may request a more frequent reporting schedule based on site-specific conditions.

Report Type: Groundwater Monitoring Land Treatment Progress Report O&M Report
 Other _____

Adequacy of Operator's General Liability Insurance and Financial Assurance

Describe the adequacy of the Operator's general liability insurance and Financial Assurance to fully address the anticipated costs of Remediation, including the estimated remaining cost for this project (below).

If this information has been provided on a Form 27 within the last 12 months, provide the Document Number of that form.

Operator anticipates the remaining cost for this project to be: \$ _____

WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? _____

Describe beneficial use, if any, of E&P Waste derived from this remediation project:

Volume of E&P Waste (solid) in cubic yards _____

E&P waste (solid) description _____

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: _____

Volume of E&P Waste (liquid) in barrels _____

E&P waste (liquid) description _____

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: _____

REMEDIATION COMPLETION REPORT

REMEDIATION COMPLETION SUMMARY

Is this a Final Closure Request for this Remediation Project? No _____

If YES:

Compliant with Rule 913.h.(1).

Compliant with Rule 913.h.(2).

Compliant with Rule 913.h.(3).

Do all soils meet Table 915-1 standards? _____

Does the previous reply indicate consideration of background concentrations? _____

Does Groundwater meet Table 915-1 standards? _____

Is additional groundwater monitoring to be conducted? _____

Operator shall comply with the COGCC 1000-Series Reclamation Requirements for all impacted and disturbed areas.

RECLAMATION PLAN

RECLAMATION PLANNING

Describe reclamation plan. Discuss existing and new grade recontouring; method and testing of compaction alleviation; and reseeding program, including location of new seed, seed mix and noxious weed prevention. Attach diagram or drawing.

On behalf of the landowner, Maralex is requesting a variance to allow the pit to continue to be used for livestock watering ponds.

Is the described reclamation complete? _____

Does the reclamation described herein constitute interim or final reclamation of the Oil and Gas Location?

Interim

Final

Did the Surface Owner provide the seed mix? _____

If YES, does the seed mix comply with local soil conservation district recommendations? _____

Did the local soil conservation district provide the seed mix? _____

SITE RECLAMATION DATES

Proposed date of commencement of Reclamation. _____

Proposed date of completion of Reclamation. _____

IMPLEMENTATION SCHEDULE

Per Rule 913.d.(2): Any change from the approved implementation schedule will be requested at least 14 days in advance, and the Operator may not make the change without the Director's approval.

PRIOR DATES

Date of Surface Owner notification/consultation, if required. _____

Actual Spill or Release date, or date of discovery. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). _____

Proposed site investigation commencement. 04/11/2014

Proposed completion of site investigation. _____

REMEDIAL ACTION DATES

Proposed start date of Remediation. _____

Proposed date of completion of Remediation. _____

Per Rule 913.d.(2): Any change from the approved implementation schedule will be requested at least 14 days in advance, and the Operator may not make the change without the Director's approval.

Change from approved implementation schedule per Rule 913.d.(2).

Basis for change in implementation schedule:

OPERATOR COMMENT

Please attached the proposed site sampling map.

I hereby certify all statements made in this form are to the best of my knowledge true, correct, and complete.

Signed: Phoebe Bechtolt

Title: Regulatory and Compliance

Submit Date: 12/21/2022

Email: pbechtolt@maralexinc.com

Based on the information provided herein, this Application for Site Investigation and Remediation Workplan complies with COGCC Rules and applicable orders and is hereby approved.

COGCC Approved: Jason Kosola

Date: 01/12/2023

Remediation Project Number: 8841

COA Type**Description**

	Operator shall fully populate the implementation schedule in accordance with Rule 913.d on the next Form 27.
	This Form 27 Supplemental is being approved as submitted. However, the next Form 27 Supplemental must be populated with the Adequacy of Operator's General Liability Insurance and Financial Assurance data field under the Remediation Progress Update tab to describe how Operator's Financial Assurance meets the requirements of Rule 703.b. and General Liability Insurance meets the requirements of Rule 705.b.
2 COAs	

Attachment Check List

Upon approval, the approved Form 27 and all listed attachments will be indexed to the Remediation Project file. Only the approved Form 27 will also be indexed to the related Facilities.

Att Doc Num**Name**

403267814	FORM 27-SUPPLEMENTAL-SUBMITTED
403267818	SOIL SAMPLE LOCATION MAP

Total Attach: 2 Files

General Comments**User Group****Comment****Comment Date**

Environmental	Operator is delinquent in filing Form 27 Supplemental in violation of Rule 913.e Per rule this remediation should be updated quarterly. Operator has failed to submit documents in the 2nd and 3rd quarter of 2022 and was in violation for 174 days. In addition to this being a rule this was also included as a COA on the previously approved Form 27 Supplemental docnum 402943081.	01/12/2023
Environmental	Operator has submitted proposed sampling diagram 303 days delinquent. COA on previously approved Form 27 402943084 stated "On the Site Investigation Plan tab, the Operator has indicated that four samples will be collected. The Operator will attach a proposed sample location diagram on a Supplemental Form 27 by the February 21, 2022 deadline." This form was submitted to comply with this COA on 12/21/2022.	01/12/2023
Environmental	COGCC checked "Rule 913.c.(9): Decommissioning of Oil and Gas Facilities." box. This remediation was submitted to document pit closure. COGCC replaced references to table 910-1 with 915-1 to reflect new rules in effect.	01/12/2023

Total: 3 comment(s)