

State of Colorado  
Energy & Carbon Management Commission



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

Document Number:  
403520592

Date Received:  
09/07/2023

FIR RESOLUTION FORM

Overall Status: BOTH

CA Summary:

8 of 8 CAs from the FIR responded to on this Form

7 CA Completed  
1 Factual Review Request

OPERATOR INFORMATION

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:  
Name: \_\_\_\_\_  
Phone: ( ) Fax: ( )  
Email: \_\_\_\_\_

Additional Operator Contact:

Contact Name	Phone	Email
O'Hare, Mickey	(970) 563-4000	amo@maralexinc.com
O'Hare, Mollie	970-563-4000	mollieo@maralexinc.com

COGCC INSPECTION SUMMARY:

FIR Document Number: 700300669  
Inspection Date: 08/29/2023 FIR Submit Date: 09/05/2023 FIR Status: \_\_\_\_\_

Inspected Operator Information:

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

LOCATION - Location ID: 306805

Location Name: Mollie Corynne 33-7-2 Number: 3C County: LA PLATA  
Qtrqr: NENE Sec: 2 Twp: 33N Range: 7W Meridian: N  
Latitude: 37.137217 Longitude: -107.571556

FACILITY - API Number: 05-067-00 Facility ID: 440997

Facility Name: Mollie Corynne 33-7-2 Number: 3C  
Qtrqr: NENE Sec: 2 Twp: 33N Range: 7W Meridian: N  
Latitude: 37.137217 Longitude: -107.571556

CORRECTIVE ACTIONS:

1 CA# 180228

Corrective Action: Install secondary containment Date: \_\_\_\_\_

Response: CA COMPLETED Date of Completion: 09/05/2023

Operator Comment: Tanks have been bermed. Location has been bermed. Please see attached photos.

COGCC Decision: Not Approved

COGCC Representative: berms not compacted, area underneath tanks not significantly impervious

COGCC Supervisor: see subsequent inspections

2  CA# 180229

Corrective Action: inspect, repair, maintain and paint (for condition, not visual impact) tanks and valves per Rule 609, 608.e and 608.g and 1002.f.  
Provide written spill contingency plan required by 608.g for all tanks including temporary tanks as FIRR  
Submit FIRR per Rule 210.b

Date: 07/21/2023

Response: CA COMPLETED

Date of Completion: 09/05/2023

Operator Comment: Tanks are used for drilling purposes only. Tanks are rented by drilling company from a third party. Maralex was informed by the third party who owns the tanks that they were repaired and the ground is almost dry around the tank. Water in the tank is drinking water and not a threat to the health, safety, welfare or environment. See attached water analysis. Tanks have been bermed. Spill report will reflect this. Spill report document number 403509665.

COGCC Decision: **Not Approved**

COGCC Representative: tanks observed still leaking in subsequent visits

COGCC Supervisor: see subsequent inspections

3  CA# 180230

Corrective Action: Stop leaks, clean up free fluids, file spill report

Date: 08/24/2023

Response: CA COMPLETED

Date of Completion: 09/06/2023

Operator Comment: Maralex was informed by the third party who owns the tanks that they were repaired and the ground is almost dry around the tank. Water in the tank is drinking water and not a threat to the health, welfare or environment. See attached water analysis. Spill report filed. Document #403509665.

COGCC Decision: **Not Approved**

COGCC Representative: operators are responsible for all equipment on site

COGCC Supervisor: see subsequent inspections

4  CA# 180231

Corrective Action: File spill report

Date: 08/24/2023

Response: CA COMPLETED

Date of Completion: 09/06/2023

Operator Comment: Doc #403520639

COGCC Decision: Approved

COGCC Representative: Note submitted date 9/6/23

5  CA# 180232

Corrective Action: clean up impacted material at wellhead of 067-08800

Date: 06/07/2023

Response: CA COMPLETED

Date of Completion: 09/05/2023

Operator Comment: Stuffing box leak was repaired. Soiled gravel removed and new gravel added.

COGCC Decision: **Not Approved**

COGCC Representative: covered up

COGCC Supervisor: see subsequent inspections

**6**  CA# 180233

Corrective Action: Fully comply with Rule 605.a by having calls returned by someone with knowledge of operations and operational authority.

Date: \_\_\_\_\_

Response: CA COMPLETED

Date of Completion: 09/05/2023

Operator Comment: Staff has been informed to communicate the urgency of returning calls.

COGCC Decision: Approved pending re-inspection

COGCC Representative: \_\_\_\_\_

**7**  CA# 180234

Corrective Action: perform and submit annual bradenhead test per Rules 419 and 420

Date: \_\_\_\_\_

Response: FACTUAL REVIEW REQUEST

Basis for Review: Corrective action dates are not attainable

Operator Comment: The well is currently temporarily abandoned for drilling operations. Annual bradenhead test will be completed prior to the end of 2023, as the rule requires.

COGCC Decision: Approved

COGCC Representative: MIT required within 30 days of temporary abandonment

COGCC Supervisor: see updated operator guidance on bradnehead test intervals when posted

**8**  CA# 180235

Corrective Action: Install vehcile tracking pad or equivalent BMPs and stop tracking onto county road. Train crews and emply spill response measures to prevent any fluids migrating off site and chemical and material handling BMs to prevent mixing of chemicals, materials and refined wastes such as motor oil, glycol and hydraulic fluid or impacting surface materials per Rule 1002.f  
  
Install BMPs on portable toilets (staking down units and having adequate spill response on

Date: \_\_\_\_\_

Response: CA COMPLETED

Date of Completion: 09/06/2023

The forecasted weather is sunny and dry for the remainder of the estimated drilling operations. Vehicle tracking pads are not necessary for this operation. Spill response measures have been enacted. Berms have been

Operator Comment: repaired and sump pump has been repaired and at full capacity. Absorbent pads, dirt and rags are located on the site for use if refined waste or fresh water spills occur. Portable toilets have been secured as per the BMPs for the vendor.

COGCC Decision: **Not Approved**

COGCC Representative: On 9/6/23 rig stated they were out of spill response materials, non-compliant conditions in regards to materials handling, spill response/prevention, self inspection and drilling fluids/cuttings management continue, no vehicle tracking pad or BMPs installed as of 9/13/23

COGCC Supervisor: see subsequent inspections

**OPERATOR COMMENT AND SUBMITTAL**

Comment: I am very new to the reporting process, as we recently lost our compliance person and haven't been able to find a replacement. The learning curve is steep, as we are extremely short-handed, but I have been in contact with Jason Kosola via phone and email throughout this process to keep him informed of the facts that, while we were behind on submitting the paperwork side of things, we have consistently been working on all notified issues. Thank you.

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

Print Name: Mollie O'Hare Signed: \_\_\_\_\_

Title: EA Date: 9/7/2023 10:05:42 AM

**ATTACHMENT LIST**

View Attachments in Imaged Documents on COGCC website (<http://ogccweblink.state.co.us/>) - Search by Document Number.

<b><u>Document Number</u></b>	<b><u>Description</u></b>
403520592	FIR RESOLUTION SUBMITTED
403522601	PHOTO DOCUMENTATION
403522653	PHOTO DOCUMENTATION
403522655	PHOTO DOCUMENTATION
403522677	WATER ANALYSIS
403522689	WATER ANALYSIS

Total Attach: 6 Files