

State of Colorado
Energy & Carbon Management Commission



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Document Number:
404648930

Date Received:
05/07/2026

FIR RESOLUTION FORM

Overall Status:

CA Summary:
5 of 5 CAs from the FIR responded to on this Form
3 CA Completed
0 Factual Review Request

OPERATOR INFORMATION

ECMC 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
MOLLIE O'HARE	970-563-4000	mollieo@maralexinc.com

ECMC INSPECTION SUMMARY:

FIR Document Number: 719001934
Inspection Date: 04/30/2026 FIR Submit Date: 04/30/2026 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: 333661

Location Name: KEEGAN PRTRICK-N33N7W Number: 11NWNW County: LA PLATA
Qtrqtr: NWN Sec: 11 Twp: 33N Range: 7W Meridian: N
W
Latitude: 37.122550 Longitude: -107.582670

FACILITY - API Number: 05-067-00 Facility ID: 271095

Facility Name: KEEGAN PATRICK Number: 33-7-11 #1
Qtrqtr: NWN Sec: 11 Twp: 33N Range: 7W Meridian: N
W
Latitude: 37.122550 Longitude: -107.582670

CORRECTIVE ACTIONS:

1 CA# 212602

Corrective Action: 608.e MAINTAIN LUBRICATION SYSTEM CLEAN UP IMPACTED SOIL AROUND WELLHEAD rule 1002.f Date: 05/03/2026

Response: OTHER

Operator Comment: The well head will be cleaned later this week or next week: by 5/15/26

ECMC Decision: _____

ECMC Representative:

2 CA# 212603

Corrective Action: IMMEDIATE ACTION REQUIRED Comply with the fencing requirements per the 1002a rules FOR PROTECTION OF THE PUBLIC, LIVESTOCK AND WILDLIFE

Date: _____

Response: CA COMPLETED

Date of Completion: 05/01/2026

Operator Comment: Maralex removed all damaged fencing around both wells and replaced it with hardy calf wire panels, reinforced with more t-posts, on May 1, 2026.

ECMC Decision: _____

ECMC Representative:

3 CA# 212604

Corrective Action: IMMEDIATE ACTION REQUIRED. Equipment must be returned to manufacturers safety specifications FOR SAFETY AND PROTECTION OF THE PUBLIC, LIVESTOCK AND WILDLIFE FOR ONGOING OPERATIONS

Date: _____

Response: CA COMPLETED

Date of Completion: 05/06/2026

Operator Comment: The belt guards have been rehung as of May 6, 2026. However, prior to this, the guards were set in such a way within the fencing that surrounded the pump jack that access to the belts was prevented, thus protecting wildlife, the public, etc.

ECMC Decision: _____

ECMC Representative:

4 CA# 212605

Corrective Action: Stormwater management Erosion Control Install or repair required BMPs per Rule 1002.f.(2)C

Date: 05/03/2026

Response: OTHER

Operator Comment: Maralex is discussing with landowner how to coordinate irrigation efforts so that Maralex can put a culvert under the road. To my knowledge, this access issue is a recent problem as I am not aware of there ever being water in that field before now.

ECMC Decision: _____

ECMC Representative:

5 CA# 212606

Corrective Action: Install or repair required BMPs per Rule 1002.f.(2)C

Date: 05/03/2026

Response: CA COMPLETED

Date of Completion: 04/29/2026

Operator Comment: This is a duplicative corrective action. Please see 212606.

ECMC Decision: _____

ECMC
Representative:

OPERATOR COMMENT AND SUBMITTAL

Comment: On the morning of April 29th, 2026, Maralex' lease operator discovered a dead calf entangled in the fencing of the Keegan Patrick #1. There was no emergency, the calf had long been dead, as was evident by the swelling, nor were operations in any way inhibited; the calf was not smashed by the weights, nor entangled in the belts. The calf had apparently tried to put its foot through the hog wire and panicked when it caught, smashing the fencing, pulling out two t-posts, bent other t-posts, and destroyed the fencing. The lease operator immediately shut down the well and called the landowner three times, leaving one voicemail to let him know about the calf.

Eventually the landowner arrived on location and verbally assaulted the lease operator, who was working to remove the dead calf. After several minutes of verbal abuse and no sign of productive conversation, the lease operator left the pad and called our President. Another Maralex representative came shortly after to video the site. After this, the landowner and Maralex' President proceeded to play phone tag over the next two days, regarding this issue. It was apparently within that time frame that the landowner decided to file a complaint with ECMC.

The Keegan Patrick #1 was shut down immediately upon discovery of the calf on April 29, 2026. The Keegan Patrick #3B was shut down on April 30, 2026 and was still fenced in.

On May 1, 2026, Maralex pulled out all the old fencing on the location and replaced it with heavier calf-wire panel fencing, reinforced with more t-posts. Maralex is working with the landowner on replacing the calf. We are not aware of "previously requested" replacement fencing by the landowner.

On April 30, 2026 around 4:30pm, Mr. Steve Labowskie called Maralex' emergency line and reached our receptionist. There was no emergency, and Mr. Labowskie had already seen for himself that Maralex was handling the situation well as the well had already been shut down, the calf had been disentangled, and the landowner had been reached out to, yet he was so "rude and forceful" that our receptionist defensively had to remind him who he was speaking to and that she would contact the appropriate people. Our receptionist immediately contacted both office and field personnel and informed them of Mr. Labowskie's phone call and concerns. Our president actually met Mr. Labowskie and the landowner within about 20 minutes of Mr. Labowskie's phone call, in person, on site, proving Maralex is in compliance with rule 605.f.(1).A. and our phone system works very efficiently, despite ECMC's accusations to the contrary.

When you call our emergency line, our receptionist fields the call to the appropriate person. If you call this number after hours, you get the number of the person on-call. This system is typical of most businesses. A similar system was actually recommended by Mr. Labowskie himself to overcome the issue of employee turnover and ensure someone is always reachable.

There is no need for unprofessional, "rude, forceful, brazen, demanding" behavior from ECMC at any time, but especially since Maralex had already proactively dealt with the issue the day before by immediately shutting in the well, removing the calf, and was seeking to contact and work with the landowner to replace the calf. The fencing has been replaced with stronger material as of May 1, 2026. In addition to photos, Maralex has attached its correspondence with Mr. Labowskie and Mr. Jason Gomez regarding this matter.

Maralex is continuing to work with the landowner and the ECMC to ensure this matter is finalized quickly and amiably.

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: E.A.

Date: 5/7/2026 2:27:02 PM

ATTACHMENT LIST

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

Document Number	Description
404648930	FIR RESOLUTION SUBMITTED
404650346	EMAIL CHAIN WITH ECMC STAFF REGARDING DEAD CALF ISSUE
404650922	TIMELINE AND PHOTOS

Total Attach: 3 Files