



Ursa Operating Company LLC

1050 17th St., Suite 2400, Denver, CO 80265

January 12, 2015

Colorado Oil and Gas Conservation Commission
1120 Lincoln Street, Suite 801
Denver, CO 80203

Attn: Mr. Matt Lepore, COGCC Director

Re: **Rule 604.b.(1).A Exception Location Request**
Valley Farms F13 (05-045-18285)
Township 6 South, Range 92 West, 6th PM
NWSW-Sec.14: 2133' FSL, 336' FWL (surface location)
Garfield County, Colorado

Mr. Lepore:

Please let this letter serve as a request for administrative approval of an exception to Rule 604.a.(2) as allowed under Rule 604.b.(1).A.

Ursa Operating Company LLC (Ursa) is re-filing the Form 2, Application for Permit to Drill (APD) for the subject Williams Fork-Iles well to drill to TD since the permit has expired. The proposed well will be located on the existing Valley Farms F Pad (Location ID# 335538) which was approved and constructed prior to the implementation of the Rule 604.a.

Due to the proximity of the Building Unit located 759' from the proposed well and existing facilities, this location now falls within a Buffer Zone Setback. This location meets the criteria for an exception as outlined in Rule 604.b.(1)A. As required for the approval of the exception, Best Management Practices to mitigate noise, odors, light, dust and other nuisance conditions have been attached to the Form 2, APD for COGCC review and approval.

This location has been built. No additional surface disturbance is required for the subject well, therefore there is no amended Form 2A being submitted. Conductor casing has not been set for this well. There are currently 8 producing wells and 1 injection well on this pad. Ursa has obtained a Surface Use Agreement for this location.

Please contact me at (720) 508-8362 or jlind@ursaresources if you have any questions.

Sincerely,
Ursa Operating Company LLC

Jennifer Lind
Regulatory Analyst