

## Dave Kubezko - DNR

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**From:** Dave Kubezko - DNR  
**Sent:** Tuesday, August 11, 2015 9:25 AM  
**To:** dave.kubezko@state.co.us  
**Subject:** FW: URSA Operating Company LLC, Monument Ridge B Pad, SESE Sec 8 T7S R95W, Garfield County, Form 2A#400838736 Review

**Categories:** Operator Correspondence

Scan No 2107633

OPERATOR CORRESPONDENCE

2A#400838736

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**From:** Cari Mascioli [mailto:[CMascioli@ursaresources.com](mailto:CMascioli@ursaresources.com)]  
**Sent:** Monday, August 10, 2015 12:06 PM  
**To:** Dave Kubezko ([dave.kubezko@state.co.us](mailto:dave.kubezko@state.co.us))  
**Subject:** RE: URSA Operating Company LLC, Monument Ridge B Pad, SESE Sec 8 T7S R95W, Garfield County, Form 2A#400838736 Review

Dave,

We appreciate the opportunity to comment on the proposed COAs, please see our comments below. Let me know if you have any questions.

Thank you,  
Cari

**Cari Mascioli**  
Regulatory Technician



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Rifle, CO 81650  
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**From:** Dave Kubezko - DNR [mailto:[dave.kubezko@state.co.us](mailto:dave.kubezko@state.co.us)]  
**Sent:** Thursday, August 06, 2015 2:26 PM  
**To:** Cari Mascioli <[CMascioli@ursaresources.com](mailto:CMascioli@ursaresources.com)>  
**Subject:** URSA Operating Company LLC, Monument Ridge B Pad, SESE Sec 8 T7S R95W, Garfield County, Form 2A#400838736 Review

Cari,

I have been reviewing the Monument Ridge B Pad **Form 2A #400838736**. Based on COGCC's review, COGCC would like to attach the following conditions of approval (COAs) based on the information and data URSA has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

**Planning:** The following conditions of approval (COAs) will apply:

**COA 91** - Notify the COGCC 48 hours prior to start of pad construction, rig mobilization, spud, start of hydraulic stimulation operations, start of flowback operations (if different than the start of hydraulic stimulation operations), and pipeline testing using Form 42 (the appropriate COGCC individuals will automatically be email notified, including the LGD for hydraulic stimulation operations).

**Agree**

**COA 91a** - Operator will implement sufficient public notification of proposed oil and gas activities. **These may include the following:** (1) provide 30 day advance notice and community awareness to neighborhood; (2) schedule changes will be communicated to the community at meetings or emails; (3) notify local emergency response agencies (Fire/Police) of schedule changes; and (4) notify all homes within a ¼-mile radius and local emergency responders (Fire/Police) 7 days prior to mobilization in, rig up (MIRU).

**Ursa believes that these notifications are adequately addressed. In addition Ursa holds numerous community and stakeholder meetings as identified in the application BMPs.**

**COA 91b** - Operator will review local governmental requirements for access from public roads. At a minimum the following traffic requirements will apply: (1) operator will work with the Garfield County Road and Bridge Department to develop and implement a traffic control plan that, at a minimum: a) establishes designated haul routes, b) designates haul routes to avoid school zones and schedules heavy equipment movement to avoid school bus operation hours, c) provides for additional signage on major and/or local roads to be employed during heavy activity periods warning of increased truck traffic, d) restricts all oil and gas related construction, drilling, and operational traffic to access the location from a single point, e) provides for flaggers and/or pilot vehicles as necessary, and f) schedules work to avoid peak traffic flow.

**Agree**

**In addition, this location has been designated a “sensitive area” due to proximity to downgradient surface water (the well pad will be built over a drainage that leads to an intermittent stream and another intermittent stream is located approximately 326’ to the north) and proximity to a domestic water well (104’).**

**Construction:** The following conditions of approval (COAs) will apply:

**COA 23** - Operator must ensure secondary containment for any volume of fluids contained at well site during drilling and completion operations; including, but not limited to, construction of a berm or diversion dike, diversion/collection trenches within and/or outside of berms/dikes, site grading, or other comparable measures (i.e., best management practices (BMPs) associated with stormwater management) sufficiently protective of nearby surface water. Any berm constructed at the well pad location will be stabilized, inspected at regular intervals (at least every 14 days and after precipitation events), and maintained in good condition.

**Agree**

**COA 44** - Since the proposed access road crosses an intermittent stream, the access road will be constructed and maintained as to not allow any sediment to migrate from the access road to nearby surface water or any drainages or ditches leading to surface water.

**Agree**

**COA 76** - Strategically apply fugitive dust control measures, including encouraging established speed limits on private roads, to reduce fugitive dust and coating of vegetation and deposition in water sources.

**Agree**

**COA 41** - Operator has indicated they have prepared a job specific Emergency Management/Response Plan. Operator will provide temporary engineering controls to prevent uncontrolled public access during drilling and completion activities. Site security shall include, but not be limited to, appointing a Health and Safety Officer that will insure the Emergency Management/Response Plan is adhered to and who is authorized to shut down operations at any time when health and safety risk is present.

**Ursa will continue to use Job Safety Analysis (JSA) as well as signage stating “authorized personnel only” as engineering controls.**

**COA 43** - Operator will take aggressive action to establish vegetation on cut and fill slopes to prevent storm water erosion and the generation of fugitive dust. Operator shall install and maintain native vegetative visual buffering on the west and east sides in conjunction with site stabilization. Visual mitigation shall also include the use of low profile tanks.

**Agree**

**COA 58** - Berms or other containment devices shall be constructed to be sufficiently impervious (corrugated steel with poly liner) to contain any spilled or released material around permanent crude oil, condensate, and produced water storage tanks.

**Agree**

**Drilling/Completions:** The following conditions of approval (COAs) will apply:

**COA 38** - The moisture content of drill cuttings managed onsite shall be kept as low as practicable to prevent accumulation of liquids greater than de minimis amounts. Operator indicates that cuttings will be disposed of offsite. No onsite disposal of cuttings or disposal to another oil and gas location shall occur without prior approval of a an amended Waste Management Plan (submitted via a Form 4 Sundry Notice) specifying disposal location and waste characterization method. Any drill cuttings that will remain on the well pad location (cuttings management area, the cut portion of the pad, cuttings trench, dry cuttings drilling pit), must meet the applicable standards of Table 910-1. Land-farming of E&P waste is prohibited on the location; however, this shall not preclude onsite disposal of E&P waste in accordance with COGCC Rules and permit conditions. After the drill cuttings have been amended (if necessary) and placed on the well pad, sampling frequency of the drill cuttings (to be determined by the operator) shall be representative of the material left on location.

**Agree**

**COA 51** - Lighting abatement measures beyond the requirements of **Rule 803**. shall be implemented, including the following, at a minimum: (1) rig oriented to direct light away from nearby residents; (2) install lighting shield devices on all of the more conspicuous lights; (3) low density sodium lighting; and (4) rig shrouded on the west and east sides.

**Agree with the exception of low density sodium lighting as Ursa is currently utilizing a super single style rig, which is significantly shorter than that of a traditional triple style drilling rig. Ursa will ensure lighting is facing in a downward direction.**

**COA 53** - Emissions from condensate, crude oil, and produced water tanks and from glycol dehydrators shall be controlled as described in **Rule 805.b.(2)**, notwithstanding the exceptions for production facilities emitting less than five tons per year (TPY) of volatile organic compounds (VOC).

**Agree**

**COA 54** - Air quality and odor controls will be implemented and will include the following : (1) flowback stream to be routed from wellhead to a "four-phase" separator and then to a sealed flowback tank, with non-salable gas sent to a temporary flare or VOC combustor; (2) oil or condensate captured during separation process will be sent to a tank with emissions controls; (3) frac/flowback storage tank hatches shall operate with hydrocarbon absorbing blankets to control odors; (4) operator will comply with the green completions section under **Rule 805.b.(3)**; and (5) maintain a portable meteorological weather station during well drilling and completion operations, that includes a data logger to archive wind speed, wind direction, and temperature, with information provided to COGCC and CDPHE.

**Agree with the exception of (5) regarding a portable weather station. Existing weather station data and air quality data is available from multiple public sources including Garfield County.**

**COA 25** - Flowback and stimulation fluids must be sent to tanks, separators, or other containment/filtering equipment before the fluids can be placed into any pipeline or storage vessel located on the well pad; or into tanker trucks for offsite disposal. The flowback and stimulation fluid tanks, separators, or other

containment/filtering equipment must be placed on the well pad in an area constructed to be sufficiently impervious to contain any spilled or released material.

**Agree**

**Material Handling and Spill Prevention:** The following conditions of approval (COAs) will apply to the Form 2A Permit if any temporary surface pipelines (poly or steel) or buried (poly or steel) pipelines are used during operations at the well pad location or nearby well pads:

**COA 45** - Operator shall pressure test pipelines in accordance with Rule 1101.e.(1) prior to putting into initial service any temporary surface or permanent buried pipelines and following any reconfiguration of the pipeline network.

**Agree, Ursa will pressure test flowlines upstream of the point of sale.**

**COA 55** - Operator will utilize, to the extent practical, all existing access and other public roads, and/or existing pipeline right-of-ways, when placing/routing the surface pipelines. This will reduce surface disturbance.

**Agree**

COGCC would appreciate your concurrence with attaching these COAs to the Form 2A permit prior to passing the OGLA review. The above COAs have been previously attached to URSA's existing, and nearby, Watson Ranch Pad (OGCC Facility ID#413055), Monument Ridge Pad (OGCC Facility ID#422286), and Watson Ranch B Pad (OGCC Facility ID#440705). If you have any questions, please do not hesitate to call me at (970) 309-2514 (cell), or email. Thanks.

Dave

David A. Kubeczko, PG  
Oil and Gas Location Assessment Specialist  
Western Colorado



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