

State of Colorado  
Oil and Gas Conservation Commission

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Document Number:  
401790725

Date Received:  
10/10/2018

**FIR RESOLUTION FORM**

Overall Status: **BOTH**

CA Summary:

4 of 5 CAs from the FIR responded to on this Form

3 CA Completed  
1 Factual Review Request

**OPERATOR INFORMATION**

OGCC Operator Number: 10447  
Name of Operator: URSA OPERATING COMPANY LLC  
Address: 792 BUCKHORN DR  
City: RIFLE State: CO Zip: 81650

Contact Name and Telephone:  
Name: \_\_\_\_\_  
Phone: ( ) \_\_\_\_\_ Fax: ( ) \_\_\_\_\_  
Email: \_\_\_\_\_

Additional Operator Contact:

Contact Name	Phone	Email
<u>Ferrin, Jeremy</u>		<u>jeremy.ferrin@state.co.us</u>
<u>margaret.ash@state.co.us</u>		
<u>Knudson, Dwayne</u>	<u>970-456-3335</u>	<u>dknudson@ursaresources.com</u>
<u>Longworth, Mike</u>		<u>mike.longworth@state.co.us</u>

**COGCC INSPECTION SUMMARY:**

FIR Document Number: 680200176  
Inspection Date: 09/12/2018 FIR Submit Date: 10/08/2018 FIR Status: \_\_\_\_\_

**Inspected Operator Information:**

Company Name: URSA OPERATING COMPANY LLC Company Number: 10447  
Address: 1600 BROADWAY ST STE 2600  
City: DENVER State: CO Zip: 80202

**LOCATION** - Location ID: 446582

Location Name: BMC D PAD Number: \_\_\_\_\_ County: \_\_\_\_\_  
Qtrqtr: NENW Sec: 18 Twp: 7S Range: 95W Meridian: 6  
Latitude: 39.441460 Longitude: -108.040712

**FACILITY** - API Number: 05-045-00 Facility ID: 446582

Facility Name: BMC D PAD Number: \_\_\_\_\_  
Qtrqtr: NENW Sec: 18 Twp: 7S Range: 95W Meridian: 6  
Latitude: 39.441460 Longitude: -108.040712

**CORRECTIVE ACTIONS:**

**1**  CA# 119397

Corrective Action: Operator can immediately stop the use of temporarily tanks at this permanent production facility or modify apply additional BMPs reduce odors from this facility.

Date: 10/10/2018

Response: CA COMPLETED Date of Completion: 10/10/2018

Comment on CA indicated no berms are installed around temp tanks and no liner under flowback tanks. There

Operator Comment: are berms around temp tanks (see attached photos), footprint is expanded to allow flowback equipment to be inside of containment.

COGCC Decision: **Not Approved**

COGCC Representative:

COGCC Supervisor: No corrective actions have been conducted. Odors were identified off the location. Review and investigation including OGI camera noted odors and emissions at this location. Frac tanks have unsealed hatches that are opened during daily production operations. Frac tanks are used to store and separate condensate. Install BMPs to control odors or immediately cease using temp frac tanks for production operations. Data shows all wells on production. In response to operator comment: Site was visited on 9-12 and 9-17 with detailed photo documentation and no berm was observed. Current small piles of gravel in operator photos were not present during inspections and are inadequate for secondary containment. Failure to make corrective actions may result in the issue being referred for enforcement.

2  CA# 119398

Corrective Action: Operator can immediately stop the use of temporarily tanks at this permanent production facility or modify apply additional BMPs reduce odors from this facility. Flow back tanks are less than 3ft apart. Flow back tanks do not meet requirements of 605.a. (1)

Date: 09/30/2018

Response: FACTUAL REVIEW REQUEST

Basis for Review: Corrective action dates are not attainable

Operator Comment: CA date is 9 days prior to operator receiving inspection.

COGCC Decision: **Not Approved**

COGCC Representative:

COGCC Supervisor: Operator has 5 days from 10-2018. However, the Corrective Action on the FIR should have been immediate and operator should maintain compliance with COGCC rules at all times regardless of inspection status.

4  CA# 119400

Corrective Action: Operator can immediately stop the use of temporarily tanks at this permanent production facility or modify apply additional BMPs reduce odors from this facility.

Date: 10/10/2018

Response: CA COMPLETED Date of Completion: 10/10/2018

Operator Comment: 4 of the 28 wells are still on flowback, thru our green completion flowback equipment. They are not part of permanent production yet. Production tanks were installed 10/5/18, plumbed in on 10/8-9/18) and are operational as of 10/10/18 and currently have 24 of the 28 wells flowing into them. During inspection dates (9/12/18 and 9/17/18) all 28 wells were still on green completions flowback equipment.

COGCC Decision: **Not Approved**

COGCC Representative:

COGCC Supervisor: COGCC records show all wells producing. Temporary frac tanks do meet state safety standards for production tanks. Immediately install equipment that meets standards outlined in 605.a. Operator comment that 4 wells on flowback: Data does not support this. However, flowing back 4 wells while 24 are produced does not meet state safety requirements. Flare on site appeared to be in operation. Flaring of a natural gas well is not a green completion. Frac tanks that are not sealed and have hatches that are opened during daily operations do not requirement for Oil and gas facilities and equipment to be operated in such a manner that odors and dust do not constitute a nuisance or hazard to public welfare.

5  CA# 119401

Corrective Action: Remove, or label and install BMP around stored fuel can.

Date: 10/10/2018

Response: CA COMPLETED

Date of Completion: 10/10/2018

Operator Comment: Fuel can has been removed. Contractor will not leave can out again.

COGCC Decision: Approved pending re-inspection

COGCC Representative:

**OPERATOR COMMENT AND SUBMITTAL**

Comment: Please send to Mr. Kellerby

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

Print Name: Dwayne Knudson Signed: \_\_\_\_\_

Title: Environmental Manager Date: 10/10/2018 2:49:43 PM

**ATTACHMENT LIST**

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

<u>Document Number</u>	<u>Description</u>
401790725	FIR RESOLUTION SUBMITTED
401791516	Temp berm
401791520	Temp berm

Total Attach: 3 Files