

State of Colorado
Oil and Gas Conservation Commission

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Document Number:
402364744
Date Received:
04/08/2020

FIR RESOLUTION FORM

Overall Status: CAC

CA Summary:

1 of 1 CAs from the FIR responded to on this Form

1 CA Completed
0 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
Knudson, Dwayne 970-456-3335 dknudson@ursaresources.com

COGCC INSPECTION SUMMARY:

FIR Document Number: 692401950
Inspection Date: 02/27/2020 FIR Submit Date: 03/11/2020 FIR Status:

Inspected Operator Information:

Company Name: URSA OPERATING COMPANY LLC Company Number: 10447
Address: 950 17TH STREET, SUITE 1900
City: DENVER State: CO Zip: 80202

LOCATION - Location ID: 336028

Location Name: River Ranch Number: C Pad County:
Qtrqr: NESW Sec: 8 Twp: 6S Range: 92W Meridian: 6
Latitude: 39.539888 Longitude: -107.692313

FACILITY - API Number: 05-045-00 Facility ID: 336028

Facility Name: River Ranch Number: C Pad
Qtrqr: NESW Sec: 8 Twp: 6S Range: 92W Meridian: 6
Latitude: 39.539888 Longitude: -107.692313

CORRECTIVE ACTIONS:

1 CA# 137130

Corrective Action: Reclaim Location for Interim Reclamation per COGCC 1003 Series Rules; installing Reclamation in areas no longer needed for Use, Production, Drilling or Subsequent Operations. Reclamation activities to be complete by 5/15/20. Date: 05/15/2020

Response: CA COMPLETED Date of Completion: 04/08/2020

Operator Comment: As a prudent Operator, our priority is ensuring and protecting Health, Safety and the Environment, as responsibly as is reasonably possible. With that in mind, Environmental matters should not be addressed at the expense of Health and Safety concerns. When viewing a well pad for reclamation activities – in this case, Interim Reclamation, we must look at all factors as they relate to Health, Safety and the Environment and weigh them accordingly. Some of the applicable factors are Regulatory mandates, Operational complexities / feasibilities and binding agreements such as, but not limited to: Wildlife stipulations, local authorities and legally binding

commitments (SUAs, etc.).

As you are aware, each well pad, further, each potential interim reclamation project must be viewed as unique – one size does not fit all. Although each well pad or pad location may be in the same region, they can vary based on multiple factors such as: well count, surface layout, target formation, well pressure, directional layout, overall pad size, production equipment needs, flowline location, production equipment layout, surrounding vegetation, access points and egress points, to name but a few. The River Ranch C pad has already undergone interim reclamation as responsibly as is reasonably possible without hindering our ability to safely and effectively maintain this well. We are requesting this CA to further reclaim the location by 5/15/2020 be dismissed as any further reduction in pad size is not operationally feasible without compromising Health and Safety. As previously stated, each interim reclaim project must be viewed on a case by case basis; therefore, we welcome the opportunity to discuss each instance should any need arise.

In this instance, when the River Ranch C well needs maintenance, a workover will be required. The equipment needed for the safe operations of a workover will require every bit of the pad to both maintain the setbacks and allow for safe operations to take place. As is clearly indicated in the attached location map (by a red outline), we made every effort to ensure that the pad is as small as is possible while still maintaining our stated goals of ensuring and protecting Health, Safety and the Environment.

Thank you in advance for your consideration and attention to our concerns regarding safety,

COGCC Decision: _____

COGCC
Representative:

OPERATOR COMMENT AND SUBMITTAL

Comment: Please send to Lou Colby.

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: 4/8/2020 12:28:53 PM

ATTACHMENT LIST

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

Document Number **Description**

402364746	Location Map
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Total Attach: 1 Files