

Dave Kubeczko - DNR

From: Dave Kubeczko - DNR
Sent: Wednesday, April 09, 2014 9:18 AM
To: dave.kubeczko@state.co.us
Subject: FW: Valley Farms L Form 2A (doc #400538780)

Categories: Operator Correspondence

Scan No 2106976 CORRESPONDENCE 2A#400538780

From: Rob Bleil [mailto:rbleil@ursaresources.com]
Sent: Wednesday, April 09, 2014 9:13 AM
To: Dave Kubeczko - DNR; Cari Chelewski
Subject: RE: Valley Farms L Form 2A (doc #400538780)

Agree. Thanks Dave.

Robert (Rob) Bleil

*Ursa Regulatory & Environmental Manager
Ursa Operating Company LLC*

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Direct Line: (970) 329-4373
Denver Office: (720) 508-8350
Cell: (720) 425-0303
E-Mail: rbleil@ursaresources.com*

From: Dave Kubeczko - DNR [mailto:dave.kubeczko@state.co.us]
Sent: Wednesday, April 09, 2014 9:02 AM
To: Cari Chelewski; Rob Bleil
Subject: FW: Valley Farms L Form 2A (doc #400538780)

Cari and Rob,

To avoid any ambiguity, COGCC would like to make the following (and final) correction (remove yellow highlighted text below) to Ursa's comment on the Submit Tab of the Form 2A:

The estimated size of location after interim reclamation is based on temporary reclamation and dependent upon Ursa's plans to return to the location at a later date. Ursa currently plans to return to Valley Farms L Pad 3 or 4 times over the next 12-16 months to drill additional wells. Once those wells have been drilled Ursa agrees to complete interim reclamation within 12 months.

Based on our conversation on 04-09-14, I believe we are all in agreement with this. Please concur with this correction and the Form 2A can be processed/approved in a timely manner. Thanks.

Dave

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

Western Colorado



Colorado Oil & Gas Conservation Commission
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Cell: (970) 309-2514
dave.kubeczko@state.co.us | www.colorado.gov/cogcc



From: Stanczyk - DNR, Jane [mailto:jane.stanczyk@state.co.us]
Sent: Wednesday, April 09, 2014 7:27 AM
To: Deranleau - DNR, Greg; Dave Kubeczko - DNR
Subject: Re: Valley Farms L Form 2A (doc #400538780)

Greg & Dave

The comment now looks like this

and nearest water well was measured from pad center to the ditch as shown on the attached hydrology map (Attachment E). Please refer to the BMPs for this pad in regards to Ursa's compliance with Rule 317B notifications. The estimated size of location after interim reclamation is based on temporary reclamation and dependent upon Ursa's plans to return to the location at a later date. Ursa will be returning to Valley Farms L Pad 3 or 4 times over the next 12-16 months to drill additional wells. Once those wells have been drilled Ursa agrees to complete interim reclamation within 12 months. For any regulatory questions, please contact Rob Bleil at 720-425-0303 or rbleil@ursaresources.com.

As I stated yesterday, reclamation is important - for all every operator and at every location in the state (thanks Greg).

I think the requirements of Rule 1003 are clear and anything other than strict compliance would require approval of a Rule 502b variance, approved by the Reclamation Specialists within the Field Inspection Unit, granted by Matt and reported to the Commission.

Therefore, I do not want to approve this 2A with any reclamation language:

The estimated size of location after interim reclamation is based on temporary reclamation and dependent upon Ursa's plans to return to the location at a later date. Ursa will be returning to Valley Farms L Pad 3 or 4 times over the next 12-16 months to drill additional wells. Once those wells have been drilled Ursa agrees to complete interim reclamation within 12 months.

I believe all this is needed, because it is somewhat helpful to everyone, is the "FYI" comment about their "plans":

Ursa will be returning to Valley Farms L Pad 3 or 4 times over the next 12-16 months to drill additional wells.

All the highlighted language is unnecessary, ambiguous relative to Rule 1003, and therefore, confusing. It should simply be removed.

Dave - in your voice mail you said "Ursa is committed to return 3 - 4 times over the next 12 - 16 months". That is nice to know, but I do not think that we want to approve "commitments" like that because plans change. In fact, the phrase "will be returning" would probably be more accurate as "currently plans to return". Without the approval of a Rule 502b Variance, the approved 2A needs to be inclusive of whatever the future brings, leaving the reclamation aspect subject to the Rule, without any complications introduced by language in the approved 2A.

Please Note: I have placed this 2A on hold.

Please let me know when you think it is ready to go.

Jane Stanczyk

Permit & Technical Services Manager



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From: Rob Bleil [mailto:rbleil@ursaresources.com]
Sent: Tuesday, April 08, 2014 7:25 PM
To: Deranleau - DNR, Greg
Cc: Cari Chelewski; Dave Kubeczko - DNR; Jane Stanczyk - DNR
Subject: Re: Valley Farms L Form 2A (doc #400538780)

Greg...have to agree that the way this was written could be confusing. Ursa recognizes that interim reclamation applies to all locations and not just 317B areas. This is reflected in Ursa's Reclamation Plan and tracking database.

Thanks,

Rob

Sent from my iPhone

On Tue, Apr 8, 2014 at 5:06 PM, Deranleau - DNR, Greg <greg.deranleau@state.co.us> wrote:
To clarify, Rule 1003.b. applies not just because this Location is in a 317B buffer. Rule 1003.b. sets the standard for interim reclamation at all Oil and Gas Locations. The statement made on the Form 2A made it unclear as to whether or not the Location would remain compliant with the timing set forth in the Rule.

From Cari's response it appears that the removal of the highlighted statement is agreed to by Ursa.

Thanks,
Greg

On Tuesday, April 8, 2014, Cari Chelewski <cchelewski@ursaresources.com> wrote:
Dave,

Thank you for bringing this matter to our attention. Ursa will be returning to Valley Farms L Pad 3 or 4 times over the next 12-16 months to drill additional wells. Once those wells have been drilled Ursa agrees to complete interim reclamation within 12 months. Ursa appreciates the urgency put forth to get this Form 2A approved within a timely manner.

Thank you,

Cari Chelewski
Regulatory Technician



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From: Dave Kubeczko - DNR [<mailto:dave.kubeczko@state.co.us>]
Sent: Tuesday, April 08, 2014 3:11 PM
To: Cari Chelewski
Cc: Greg Deranleau - DNR; Rob Bleil; Jane Stanczyk - DNR
Subject: RE: Valley Farms L Form 2A (doc #400538780)

Cari,

The final reviewer and reclamation group has requested that the following comment (highlighted black with yellow text below) from the operator submit tab be removed as this location is within a 317B area and therefore, the reclamation rules (1003. INTERIM RECLAMATION. b. Interim reclamation of areas no longer in use. All disturbed areas affected by drilling or subsequent operations, except areas reasonably needed for production operations or for subsequent drilling operations to be commenced within twelve (12) months, shall be reclaimed as early and as nearly as practicable to their

original condition or their final land use as designated by the surface owner and shall be maintained to control dust and minimize erosion to the extent practicable.) need to be strictly adhered to. URSA has not indicated a timeframe to return to this site and drill additional wells, so interim reclamation must be done within 12 months to the size indicated on the Form 2A.

The proposed Valley Farms L 43D-11-06-92 well location was used as the reference point for footages. See attachment A and D (Visible Improvements) for cultural setback distance information. Please refer to the attached multi-well plan for the proposed well locations on this pad referenced under 'related forms'. Distance to downgradient surface water feature and nearest water well was measured from pad center to the ditch as shown on the attached Hydrology Map (Attachment E). Please refer to the BMPs for this pad in regards to Ursa's compliance with Rule 317B notifications. **The estimated size of location after interim reclamation is based on temporary reclamation and dependent upon Ursa's plans to return to the location at a later date.** For any regulatory questions, please contact Rob Bleil at [720-425-0303](tel:720-425-0303) or rbleil@ursaresources.com.

If URSA concurs, please reply and this permit can be approved today. Thanks.

Dave

David A. Kubeczko, PG

Oil and Gas Location Assessment Specialist

Western Colorado



Colorado Oil & Gas Conservation Commission

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Sent from Gmail Mobile