

## Dave Kubeczko - DNR

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**From:** Dave Kubeczko - DNR  
**Sent:** Tuesday, July 15, 2014 2:38 PM  
**To:** Dave Kubeczko - DNR  
**Subject:** FW: URSA Operating Company LLC, Tompkins Pad, SESE Sec 5 T7S R95W, Garfield County, Form 2A#400607816 Review  
**Attachments:** Attach B - Photos - 07-08-14.pdf  
**Categories:** Operator Correspondence

**Scan No 2107043      CORRESPONDENCE      2A#400607816**

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**From:** Cari Mascioli [mailto:[CMascioli@ursaresources.com](mailto:CMascioli@ursaresources.com)]  
**Sent:** Thursday, July 10, 2014 9:50 AM  
**To:** Dave Kubeczko - DNR  
**Cc:** Rob Bleil  
**Subject:** RE: URSA Operating Company LLC, Tompkins Pad, SESE Sec 5 T7S R95W, Garfield County, Form 2A#400607816 Review

Dave,

We appreciate you bringing the attachment B Location Pictures to our attention. Please see the attached revised Location Pictures. Let us know if you need further information.

Thank you,

**Cari Mascioli**  
Regulatory Technician



792 Buckhorn Drive  
Rifle, CO 81650  
Office: (970) 284-3244  
Cell: (970) 319-8236  
[CMascioli@ursaresources.com](mailto:CMascioli@ursaresources.com)

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**From:** Dave Kubeczko - DNR [mailto:[dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)]  
**Sent:** Monday, July 07, 2014 6:15 PM  
**To:** Cari Mascioli  
**Subject:** RE: URSA Operating Company LLC, Tompkins Pad, SESE Sec 5 T7S R95W, Garfield County, Form 2A#400607816 Review

Cari,

At the time of COGCC's review, the Construction Layout Drawings attachment did not open as drawings. This attachment should be two separate attachments anyway: Construction Layout Drawings and Facility Layout Drawing. COGCC has made this correction. In addition, review of the Location Pictures does not show the well/center stake as required by **Rule 303.b. FORM 2A, OIL AND GAS LOCATION ASSESSMENT. (3) Information Requirements. B.** A minimum of four (4) color photographs, one (1) of the **staked location** from each cardinal direction. Each

photograph shall be identified by: date taken, well or location name, and direction of view. Revised Location Pictures showing at least one well stake will be required for this location. In addition, any agreements with the Town of Parachute concerning this permit should be forwarded to COGCC when URSA receives them.

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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**From:** Cari Mascioli [mailto:[CMascioli@ursaresources.com](mailto:CMascioli@ursaresources.com)]  
**Sent:** Monday, July 07, 2014 3:36 PM  
**To:** Dave Kubeczko - DNR  
**Cc:** Rob Bleil  
**Subject:** RE: URSA Operating Company LLC, Tompkins Pad, SESE Sec 5 T7S R95W, Garfield County, Form 2A#400607816 Review

Dave,

Ursa has reviewed the COAs forwarded to us on June 30, 2014. We appreciate your efforts in getting this to us for our review. Our comments are below in red after each issue brought to our attention. Please let us know if our responses are adequate for you to complete OGLA review. It appears that in some cases documents that were attached to the Form 2A may not have been forwarded to you.

COGCC: I have been reviewing the Tompkins Pad **Form 2A** (#400607816). Since the location is within a Buffer Zone, a Facility Layout Drawing is required.

**The facility layout drawing was attached, see document number 400610886, and let us know if this is adequate.**

COGCC: Based on a review by COGCC, the slope at this location ranges from 8.2% to 15.2%, averaging approximately 11.2%; therefore Construction Layout Drawings are required (the attachment labeled Construction Layout Drawings is actually an equipment list).

**Document 400610886 includes the Construction Layout drawings and the Facility layout drawings. Please let us know if you didn't receive these or what additional information would be required.**

Thank you,

**Cari Mascioli**

Regulatory Technician



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**From:** Dave Kubeczko - DNR [<mailto:dave.kubeczko@state.co.us>]

**Sent:** Monday, June 30, 2014 8:50 PM

**To:** Cari Mascioli

**Subject:** URSA Operating Company LLC, Tompkins Pad, SESE Sec 5 T7S R95W, Garfield County, Form 2A#400607816 Review

Cari,

I have been reviewing the Tompkins Pad **Form 2A** (#400607816). Since the location is within a Buffer Zone, a Facility Layout Drawing is required. Based on a review by COGCC, the slope at this location ranges from 8.2% to 15.2%, averaging approximately 11.2%; therefore Construction Layout Drawings are required (the attachment labeled Construction Layout Drawings is actually an equipment list). 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, and start of flowback operations using Form 42 (the appropriate COGCC individuals will automatically be email notified, including the LGD for hydraulic stimulation operations). **Agree**

**COA 9** - As required for Groundwater Baseline Sampling; Operator shall comply with Rule **609. STATEWIDE GROUNDWATER BASELINE SAMPLING AND MONITORING**. Because of proximity of this location to existing water wells, operator shall sample a minimum of two water wells (one upgradient and one downgradient).

**Agree**

**In addition, this location has been designated a "sensitive area" due to proximity to downgradient surface water (212') and proximity to nearby domestic water well (211').**

**Ursa has held meetings with the Town of Parachute and submitted a Watershed Permit Application with the town as this location is within the Parachute Watershed. Ursa has also voluntarily initiated a limited Hydro geologic study of the area based on agreements with the Town of Parachute.**

**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 maintained in good condition.

**Ursa would like to clarify that any volume of fluids would not be applicable to 5 gallon gas cans or other liquids on vehicles that enter and exit the location daily, but this is applicable to stationary fluids, with the exception of fresh water, located at the site specifically for construction, drilling or completions.**

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

**COA 59** - Since this location is within five hundred (500) feet and upgradient of a surface water body, tertiary containment, such as an earthen berm, is required around Production Facilities.

**Ursa offers the following clarification relevant to this COA: All production tanks will have secondary containment, and an earthen berm will also contain the entire well pad, which would include the production tanks. In addition, the Town of Parachute may require containment specific to the Watershed Permit that was applied for. Ursa agrees to implement the conditions for whichever permit requirements are more stringent.**

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

**COA 38** - The moisture content of any cuttings in a cuttings pit, trench, or pile shall be as low as practicable to prevent accumulation of liquids greater than de minimis amounts. At the time of closure, if the drill cuttings are to be left onsite, they must also meet the applicable standards of table 910-1. If cuttings are to be taken offsite to an OCGG permitted cuttings trench, a Form 4 Sundry must be submitted and approved prior to offsite transport. If the cuttings are to be used offsite for beneficial reuse, a Beneficial Reuse Plan needs to be submitted via a Form 4 Sundry Notice and approved prior to offsite transport. **Agree**

**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.

**It's Ursa's understanding that Rule 1101.e.(1) refers to pressure testing of flowlines between the wellheads and separators (based on historic clarification from COGCC). However, Ursa routinely pressure tests all pipelines prior to putting them into service and therefore agrees to this COA.**

COGCC would appreciate your concurrence with attaching these COAs to the Form 2A permit prior to passing the OGLA review. 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  
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Western Colorado



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