

## Dave Kubeczko - DNR

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**From:** Dave Kubeczko - DNR  
**Sent:** Tuesday, November 17, 2015 11:52 AM  
**To:** dave.kubeczko@state.co.us  
**Subject:** URSA Operating Company LLC, Hangs A Pad, SWSE Sec 9 T6S R92W, Garfield County, Form 2A#400862577 Review  
**Attachments:** Cert of Compliance Hangs A 11-5-2015.pdf; Hangs A Pad\_603 Building Waiver - 10-28-2015.pdf; Hangs A Pad\_603 Powerline Waiver - 11-1-2015.pdf  
**Categories:** Operator Correspondence

Scan No 2107693      CORRESPONDENCE      2A#400862577

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**From:** Jennifer Lind [mailto:[jlind@ursaresources.com](mailto:jlind@ursaresources.com)]  
**Sent:** Friday, November 06, 2015 1:11 PM  
**To:** Dave Kubeczko - DNR  
**Subject:** RE: URSA Operating Company LLC, Hangs A Pad, SWSE Sec 9 T6S R92W, Garfield County, Form 2A#400862577 Review

Dave, Ursa concurs with the COAs as you have listed below including the revisions to COA 45 and COA 53 as discussed.

A rule 306.e. certification is attached. Additionally, waivers for the variance request are attached. These waivers have also been provided to Sarah Freeman to attach to the associated Form 2's. Please let me know if you have any questions or need any additional information at this time.

Thank you,  
Jennifer

720-508-8362

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**From:** Dave Kubeczko - DNR [mailto:[dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)]  
**Sent:** Thursday, November 5, 2015 7:56 AM  
**To:** Jennifer Lind <[jlind@ursaresources.com](mailto:jlind@ursaresources.com)>  
**Subject:** RE: URSA Operating Company LLC, Hangs A Pad, SWSE Sec 9 T6S R92W, Garfield County, Form 2A#400862577 Review

Jennifer,

Please see revisions to those COAs:

**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).

- o The not-withstanding terminology is confusing...does this mean emissions will need to be controlled on tanks with less than 5 tons of emissions annually? If so, this is contradictory to the CDPHE.

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

**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).

**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.

- o We believe this COA should reference flowlines...not pipelines.

**Material Handling and Spill Prevention:** The following condition of approval (COA) will apply:

**COA 45** - Operator shall pressure test pipelines (flowlines from wellheads to separators to tanks; and any temporary surface lines used for hydraulic stimulation and/or flowback operations) in accordance with Rule 1101.e.(1) prior to putting into initial service any temporary surface or permanent buried pipelines, or following any reconfiguration of the pipeline network on the well pad.

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:** Jennifer Lind [mailto:[jlind@ursaresources.com](mailto:jlind@ursaresources.com)]  
**Sent:** Wednesday, November 04, 2015 9:08 AM  
**To:** Dave Kubeczko - DNR  
**Subject:** RE: URSA Operating Company LLC, Hangs A Pad, SWSE Sec 9 T6S R92W, Garfield County, Form 2A#400862577 Review

Dave, we did have a couple of questions on the following COAs:

- **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).**
  - o The not-withstanding terminology is confusing...does this mean emissions will need to be controlled on tanks with less than 5 tons of emissions annually? If so, this is contradictory to the CDPHE.
- **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.
  - o We believe this COA should reference flowlines...not pipelines.

Thank you,  
Jennifer

720-508-8362

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

**Sent:** Wednesday, October 28, 2015 11:23 AM

**To:** Jennifer Lind <[jlind@ursaresources.com](mailto:jlind@ursaresources.com)>

**Subject:** URSA Operating Company LLC, Hangs A Pad, SWSE Sec 9 T6S R92W, Garfield County, Form 2A#400862577 Review

Jennifer,

I have been reviewing the Hangs A Pad **Form 2A #400862577**. COGCC requests that URSA Operating Company LLC (URSA) submit evidence/certification that it has complied with the requirements of **Rule 306.e**. Operator also needs to submit a waiver from the surface owner/building owner of the nearby scale house (155' from closest well) and a waiver from the electric utility company that operates the nearby above ground utility line (174' from closest well) in order to receive their variance request from **Rule 603.a.(1)**. COGCC cannot approve this Form 2A until these waivers have been received, and the Director has approved URSA's variance requests. 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 reconstruction/regrading, 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).

**COA 91a** - Operator will implement sufficient public notification of proposed oil and gas activities.

**COA 91b** - Operator will review local governmental requirements for access from public roads.

**COA 91c** - Prior to oil and gas activities starting at this well pad location, in accordance with operator's BMPs/CPOAs, operator will submit a Form 4 Sundry Notice indicating the date of notification (along with a copy of the letter) to the Town of Rifle's Public Drinking Water Supply System. Operator will also submit analytical results of any surface water samples collected in the nearby Colorado River.

**In addition, this location has been designated a "sensitive area" due to proximity to downgradient surface water (25'), proximity to a domestic water well (290'), and presence of shallow groundwater (24' below ground surface in nearby water wells).**

**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 (at a minimum as described in the Proposed BMPs attachment); 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 as in accordance with CDPHE regulations (at least every 14 days and after precipitation events), and maintained in good condition.

**COA 44** - The access road will be 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.

**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.

**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.

**COA 52** - Lighting abatement measures beyond the requirements of **Rule 803**. may need to be implemented (to be determined by operator), which may include the following: (1) rig oriented to direct light away from nearby residents; and (2) install lighting shield devices on all of the more conspicuous lights.

**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).

**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 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; and (4) operator will comply with the green completions section under **Rule 805.b.(3)**.

**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.

**Material Handling and Spill Prevention:** The following condition of approval (COA) will apply to the Form 2A:

**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.

COGCC would appreciate your concurrence with attaching the COGCC 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**  
**Oil and Gas Location Assessment Specialist**  
**Western Colorado**



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