

FORM  
2

Rev  
08/13

## State of Colorado

### Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:

400927766

**(SUBMITTED)**

Date Received:

12/15/2015

#### APPLICATION FOR PERMIT TO:

☒ Drill ☐ Deepen ☐ Re-enter ☐ Recomplete and Operate

TYPE OF WELL OIL ☐ GAS ☒ COALBED ☐ OTHER \_\_\_\_\_

Refilling ☐

ZONE TYPE SINGLE ZONE ☒ MULTIPLE ZONES ☐ COMMINGLE ZONES ☐

Sidetrack ☐

Well Name: BMC B

Well Number: 23D-18-07-95

Name of Operator: URS OPERATING COMPANY LLC

COGCC Operator Number: 10447

Address: 1050 17TH STREET #2400

City: DENVER

State: CO

Zip: 80265

Contact Name: JENNIFER LIND

Phone: (720)508-8362

Fax: ( )

Email: JLIND@URSARESOURCES.COM

#### RECLAMATION FINANCIAL ASSURANCE

Plugging and Abandonment Bond Surety ID: 20120125

#### WELL LOCATION INFORMATION

QtrQtr: SWNW Sec: 18 Twp: 7S Rng: 95W Meridian: 6

Latitude: 39.438801

Longitude: -108.046693

Footage at Surface: 2261 feet

FNL/FSL

FNL

623

feet

FEL/FWL

FWL

Field Name: WILDCAT

Field Number: 99999

Ground Elevation: 5100

County: GARFIELD

GPS Data:

Date of Measurement: 06/16/2014

PDOP Reading: 1.7

Instrument Operator's Name: HOFFMANN

If well is ☒ Directional ☐ Horizontal (highly deviated) **submit deviated drilling plan.**

Footage at Top of Prod Zone: FNL/FSL FNL/FWL Bottom Hole: FNL/FSL FNL/FWL

1401

FSL

1901

FWL

1401

FSL

1901

FWL

Sec: 18

Twp: 7S

Rng: 95W

Sec: 18

Twp: 7S

Rng: 95W

#### LOCATION SURFACE & MINERALS & RIGHT TO CONSTRUCT

Surface Ownership: ☒ Fee ☐ State ☐ Federal ☐ Indian

The Surface Owner is: ☒ is the mineral owner beneath the location.

(check all that apply)

☒ is committed to an Oil and Gas Lease.

☒ has signed the Oil and Gas Lease.

☐ is the applicant.

The Mineral Owner beneath this Oil and Gas Location is: ☒ Fee ☐ State ☐ Federal ☐ Indian

The Minerals beneath this Oil and Gas Location will be developed by this Well: No

The right to construct the Oil and Gas Location is granted by: Surface Use Agreement

Surface damage assurance if no agreement is in place:

Surface Surety ID:

## LEASE INFORMATION

Using standard QtrQtr, Sec, Twp, Rng format, describe one entire mineral lease that will be produced by this well (Describe lease beneath surface location if produced. Attach separate description page or map if necessary.)

A PORTION OF THE SW/4 OF SECTION 18-T7S-R95W. PLEASE SEE ATTACHED LEASE MAP.

Total Acres in Described Lease: 41 Described Mineral Lease is: ☒ Fee ☐ State ☐ Federal ☐ Indian

Federal or State Lease # \_\_\_\_\_

Distance from Completed Portion of Wellbore to Nearest Lease Line of described lease: 85 Feet

## CULTURAL DISTANCE INFORMATION

Distance to nearest:

Building: 378 Feet  
Building Unit: 573 Feet  
High Occupancy Building Unit: 3216 Feet  
Designated Outside Activity Area: 5280 Feet  
Public Road: 635 Feet  
Above Ground Utility: 487 Feet  
Railroad: 3857 Feet  
Property Line: 175 Feet

### INSTRUCTIONS:

- All measurements shall be provided from center of the Proposed Well to nearest of each cultural feature as described in Rule 303.a.(5).
- Enter 5280 for distance greater than 1 mile.
- Building - nearest building of any type. If nearest Building is a Building Unit, enter same distance for both.
- Building Unit, High Occupancy Building Unit, and Designated Outside Activity Area - as defined in 100-Series Rules.

## DESIGNATED SETBACK LOCATION INFORMATION

Check all that apply. This location is within a: ☒ Buffer Zone  
☐ Exception Zone  
☒ Urban Mitigation Area

- Buffer Zone – as described in Rule 604.a.(2), within 1,000' of a Building Unit
- Exception Zone - as described in Rule 604.a.(1), within 500' of a Building Unit.
- Urban Mitigation Area - as defined in 100-Series Rules.

Pre-application Notifications (required if location is within 1,000 feet of a building unit):

Date of Rule 305.a.(1) Urban Mitigation Area Notification to Local Government: 09/12/2015

Date of Rule 305.a.(2) Buffer Zone Notification to Building Unit Owners: 09/24/2015

## SPACING and UNIT INFORMATION

Distance from completed portion of proposed wellbore to nearest completed portion of offset wellbore permitted or completed in the same formation: 330 Feet

Distance from Completed Portion of Wellbore to Nearest Unit Boundary 1243 Feet (Enter 5280 for distance greater than 1 mile.)

Federal or State Unit Name (if appl): \_\_\_\_\_ Unit Number: \_\_\_\_\_

## SPACING & FORMATIONS COMMENTS

## OBJECTIVE FORMATIONS

Objective Formation(s)	Formation Code	Spacing Order Number(s)	Unit Acreage Assigned to Well	Unit Configuration (N/2, SE/4, etc.)
WILLIAMS FORK	WMFK	440-60	320	SEC.18 S/2

## DRILLING PROGRAM

Proposed Total Measured Depth: 6953 Feet

Distance from proposed wellbore to nearest existing or permitted wellbore belonging to another operator:

2490 Feet (Including plugged wells)

Will a closed-loop drilling system be used? Yes

Is H<sub>2</sub>S gas reasonably expected to be encountered during drilling operations at concentrations greater than or equal to 100 ppm? No (If Yes, attach an H<sub>2</sub>S Drilling Operations Plan)

Will salt sections be encountered during drilling? No

Will salt based (>15,000 ppm Cl) drilling fluids be used? No

Will oil based drilling fluids be used? No

BOP Equipment Type: ☐ Annular Preventor ☐ Double Ram ☒ Rotating Head ☐ None

## GROUNDWATER BASELINE SAMPLING AND MONITORING AND WATER WELL SAMPLING

Water well sampling required per Rule 609

## DRILLING WASTE MANAGEMENT PROGRAM

Drilling Fluids Disposal: OFFSITE Drilling Fluids Disposal Methods: Recycle/reuse

Cuttings Disposal: OFFSITE Cuttings Disposal Method: Commercial Disposal

Other Disposal Description:

Please see Waste Management Plan attached to the associated Form 2A

Beneficial reuse or land application plan submitted? No

Reuse Facility ID: \_\_\_\_\_ or Document Number: \_\_\_\_\_

## CASING PROGRAM

Casing Type	Size of Hole	Size of Casing	Wt/Ft	Csg/Liner Top	Setting Depth	Sacks Cmt	Cmt Btm	Cmt Top
CONDUCTOR	24	16	75	0	60	111	60	0
SURF	12+1/4	8+5/8	32	0	1830	378	1830	0
1ST	7+7/8	4+1/2	11.6	0	6953	575	6953	

☐ Conductor Casing is NOT planned

## DESIGNATED SETBACK LOCATION EXCEPTIONS

Check all that apply:

- ☐ Rule 604.a.(1)A. Exception Zone (within 500' of Building Unit)
- ☐ Rule 604.b.(1)A. Exception Location (existing or approved Oil & Gas Location now within a Designated Setback as a result of Rule 604.a.)
- ☐ Rule 604.b.(1)B. Exception Location (existing or approved Oil & Gas Location is within a Designated Setback due to Building Unit construction after Location approval)
- ☒ Rule 604.b.(2) Exception Location (SUA or site-specific development plan executed on or before August 1, 2013)
- ☐ Rule 604.b.(3) Exception Location (Building Units constructed after August 1, 2013 within setback per an SUA or site-specific development plan)

## GREATER WATTENBERG AREA LOCATION EXCEPTIONS

Check all that apply:

- ☐ Rule 318A.a. Exception Location (GWA Windows).
- ☐ Rule 318A.c. Exception Location (GWA Twinning).

## RULE 502.b VARIANCE REQUEST

☐ Rule 502.b. Variance Request from COGCC Rule or Spacing Order Number \_\_\_\_\_

## OTHER LOCATION EXCEPTIONS

Check all that apply:

- ☐ Rule 318.c. Exception Location from Rule or Spacing Order Number \_\_\_\_\_
- ☐ Rule 603.a.(2) Exception Location (Property Line Setback).

ALL exceptions and variances require attached Request Letter(s). Refer to applicable rule for additional required attachments (e.g. waivers, certifications, SUAs).

## OPERATOR COMMENTS AND SUBMITTAL

Comments First String / Production cement will be > 500 feet above TOG. Distance to nearest well completed in the same formation / permitted or existing well penetrating objective formation was measured to the proposed BMC B 23C-18-07-95. Distance to nearest well completed in the same formation / permitted or existing well belonging to another operator was measured to the existing Encana Daybreak Federal 19-3BB (PJ19) (API 05-045-19891). Please note that all pads depicted on the Exhibit B to the attached SUA are covered under one, single SUA. The entire PUD is governed by Battlement Mesa partners, who have executed the master surface use agreement. In addition to the redacted SUA, a map of the legal description per Exhibit A is attached as "Legal / Lease Description" for your reference.

The BMPs included in this Form 2 application are being submitted in accordance with Rule 604.a.(2) and specifically address the mitigation of nuisance items (noise, lighting, odors and dust) associated with well-specific development. Please refer to associated Form 2A for a full list of Rule 604 mitigation measures applicable to the pad location, preapplication notice certifications, and Garfield County Special Use Permit COAs.

Ursa requests approval of a Rule 604.a.(2) exception location in accordance with Rule 604.b.(2). Exception location request letter is attached.

This application is in a Comprehensive Drilling Plan No CDP #: \_\_\_\_\_

Location ID: \_\_\_\_\_

Is this application being submitted with an Oil and Gas Location Assessment application? Yes

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

Signed: \_\_\_\_\_ Print Name: JENNIFER LIND

Title: REGULATORY ANALYST Date: 12/15/2015 Email: JLIND@URSARESOURCES.C

Based on the information provided herein, this Application for Permit-to-Drill complies with COGCC Rules and applicable orders and is hereby approved.

COGCC Approved: \_\_\_\_\_ Director of COGCC Date: \_\_\_\_\_

Expiration Date: \_\_\_\_\_

API NUMBER

05

## Conditions Of Approval

All representations, stipulations and conditions of approval stated in the Form 2A for this location shall constitute representations, stipulations and conditions of approval for this Form 2 Permit-to-Drill and are enforceable to the same extent as all other representations, stipulations and conditions of approval stated in this Permit-to-Drill.

### COA Type

### Description

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## Best Management Practices

### No BMP/COA Type

### Description

1	Planning	• Prior to initiation of the Form 2A permitting process, internal onsite are held to
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determine the feasibility of the location (based on the SUA and landowner preferences), topographic constraints, proximity to building units, and public and environmental concerns including surface waters, traffic/haul routes, 317B applicability, wildlife RSOs and SWH areas, noise potential, soil stability, etc.

- Planning and permitting information relevant to the location based on Federal, state and county regulations, guidance and policies is documented as appropriate in Ursa's "Site Assessment Checklist/Map".
- The best management practices (BMPs) incorporated herein also considered other Federal, state and county agency requirements and guidance, including those under the jurisdiction of the Environmental Protection Agency (EPA), U.S. Fish and Wildlife Service (USFWS), U.S. Army Corps of Engineers (ACOE), Federal Emergency Management Agency (FEMA), Colorado Department of Public Health and Environmental (CDPHE), Colorado Parks and Wildlife (CPW), and Garfield County (GARCO), among others.
- Upon approval of the Form 2A, Ursa holds Pre-Construction, Pre-Spud, Pre-Completions and Pre-Production meetings with contractors performing work at the location as determined necessary by the responsible Ursa Operations Manager or Supervisor. As a BMP, Ursa has developed checklists for these meetings to review COAs, NTOs and related issues.
- 604.c.(2)D. - Traffic Plan • Ursa has developed a site-specific Emergency Response Plan and Haul Route Map which is communicated to local emergency response agencies and stakeholders, as well as contractors performing work at the location.
- 604.c.(2)V. - Development from existing well pads • Please refer to the alternatives analysis provided as an attachment to this form 2A.
- Ursa typically holds weekly meetings to address new, expanded, or additional wells at an Oil and Gas locations. Once a location is determined feasible, preliminary notifications are made to affected surface owners (see below) as a best management practice (BMP).
- Ursa has developed and implemented processes and systems to track all agency inspections and concerns (e.g. COGCC, CDPHE, BLM...). Corrective actions are typically implemented with 24 hours of discovery.
- Ursa will comply with CDPHE regulations regarding air permits, including the application for general permits, including compliance monitoring. In addition, Ursa is required to track, monitor and report Greenhouse Gas (GHG) emissions to EPA. All air sources will be assigned AIRS ID numbers and tracked for compliance and reporting purposes.
- In addition, Ursa submitted permit applications to Garfield County and received Planning Commission approval with Conditions of Approval on October 28, 2015. The Board of County Commissioners approved the Special Use Permit on Dec 16, 2015.
- AGENCY INSPECTIONS AND CORRECTIVE ACTIONS - Ursa will implement corrective actions necessary in response to all Federal and state agency inspections in a timely manner. Inspections resulting in the potential for immediate or significant environmental impacts will be addressed immediately, subject to safety and weather considerations.
- URSA VOLUNTARY INSPECTIONS - Ursa conducts voluntary inspections and corrective actions of all locations at least monthly using a self-implemented checklist of key actions (including environmental) that require compliance with COGCC, Federal, and other state and county requirements.
- AIR PERMITTING AND COMPLIANCE - Ursa will comply with CDPHE regulations regarding air permitting, compliance monitoring, inspections and reporting. All air sources will be assigned AIRS ID numbers by the CDPHE and tracked for compliance and reporting purposes. In addition, Ursa is required to track, monitor and report Greenhouse Gas (GHG) emissions to EPA annually.
- AIR PERMITTING AND COMPLIANCE - Ursa will comply with CDPHE regulations regarding air permitting, compliance monitoring, inspections and reporting. All air sources will be assigned AIRS ID numbers by the CDPHE and tracked for compliance and reporting purposes. In addition, Ursa is required to track, monitor and report Greenhouse Gas (GHG) emissions to EPA annually.
- 604.c.(2)W. - Site-specific measures • SETBACK MITIGATION REQUIREMENTS - Ursa has incorporated the mitigation requirements identified in COGCC Rule 604, as applicable on a site-specific basis into its Operations Checklists, voluntary and mandatory Site Inspections, and Environmental Programs plans, status monitoring, and policies and procedures.
- SAFETY - Safety requirements and buffers as required by the COGCC 602, 603, and 606A and 606B Series Rules, among others, and the Office of Safety and Health

		Administration (OSHA) will be observed at all time. Daily safety briefings and Job Safety Assessments (JSA's) are routinely conducted in all phases of operations. In addition, Ursa employees a full-time safety manager to oversee all field contractors.
2	Community Outreach and Notification	<ul style="list-style-type: none"> <li>•305.a.(1) - Pre-application Notifications • Once the Form 2A permitting process was initiated the LGD was notified by letter with an invitation to meet or discuss the proposal (certification attached). Communication with Kirby Wynn and municipal LGDs are also held routinely in addition to communication required by COGCC regulations.</li> <li>•305.a.(2) - Pre-application Notifications • Once the Form 2A permitting process was initiated all surface owners and owners of building units within 1000 feet of the location were notified by letter with an invitation to meet or discuss the proposal (certification attached).</li> <li>• Ursa conducted a series of five (5) stakeholder meetings between June 2015 and December 2015 which focused on development of this location. Approximately 50 community citizens and 25 oil and gas contractors and employees attended these meetings. All meetings were recorded and published on a website. The meetings covered all operations phases, potential impacts, and proposed BMPs. Mass mailings and newspaper articles and notices were published on a voluntary basis and in accordance with Garfield County noticing requirements.</li> <li>• An SUA has been signed with the landowner allowing this location to be constructed, drilled and operated in accordance with the Form 2A submitted.</li> <li>• Unless waivers are received from surface and building unit owners regarding COGCC required notifications to include: Pre-application notifications, statutory notifications, drilling and completions notifications, Ursa will complete the notifications in accordance with COGCC regulations.</li> <li>• Ursa routinely communicates proposed plans and operations schedules with Community Counts, the GARCO Energy Advisory Board, and Battlement Mesa Concerned Citizens (BMCC), if the proposal or work may affect Battlement Mesa. In addition, periodic stakeholder meetings are held with landowners and affected parties.</li> <li>• Voluntary Notifications - Once a new or expanded location, or additional wells are proposed, Ursa's land department contacts the landowner to get an initial approval, prior to formal Pre-application notifications to all affected stakeholders.</li> </ul>
3	Pre-Construction	<ul style="list-style-type: none"> <li>• FLOODPLAIN IMPACTS - Ursa completed a floodplain assessment and found that this location did not meet criteria to be designated within the 100 year floodplain.</li> <li>•604.c.(2)E.ii. - Multi-well Pads &amp; 604.c.(2)N. - Control of fire hazards" • For safety purposes, the location and site layout has been designed to accommodate all operations, including drilling and completions, within the limits of disturbance while meeting Federal and state safety regulations, including required buffers and distances between operating components and combustion sources in accordance with COGCC Section 600 Rules.</li> <li>• Water pipeline infrastructure will be installed concurrently with the gas pipeline infrastructure where possible. No water infrastructure currently exists.</li> </ul>
4	General Housekeeping	<ul style="list-style-type: none"> <li>• 604.c.(2)P. - Removal of surface trash • WASTE - The location will be managed in accordance with COGCC 907 and 907A Rules, which are incorporated into Ursa's Waste Management Plan, which addresses both E&amp;P and non-E&amp;P waste, including those under the jurisdiction of the CDPHE and EPA. The plan, in combination with Ursa's Spill Prevention and Management Plan, minimizes the potential for any exploration and production wastes, chemicals, fluids, etc. from leaving the location, using BMPs including berms, barriers, and use of spill control materials.</li> </ul>

5	Material Handling and Spill Prevention	<ul style="list-style-type: none"> <li>• <b>CHEMICAL AND MATERIAL HANDLING</b> - All materials and chemicals will be managed to minimize environmental contamination in accordance with MSDS sheets and EPA, COGCC and CDPHE regulations. Materials and chemicals that are not a waste may be reused or recycled.</li> <li>• 604.c.(2)F. - Leak Detection Plan • <b>SPILLS / INCIDENTS</b> - Spill prevention and response are addressed in Ursa's Spill Prevention and Management Plan. This includes training of employees and contractors personnel on at least an annual basis. Spill response includes notifications, reporting, response actions, remediation and corrective actions. The spill criteria in Ursa's plan requires that waste be properly classified as E&amp;P or non-E&amp;P wastes. For E&amp;P waste, all spills greater than 1 barrel (outside containment) or greater than 5 barrels (inside containment) will be reported to the COGCC using a Form 19. Should remediation be required, a Form 27 will be submitted as well. Spills related to non-E&amp;P waste will be managed in accordance with CDPHE and EPA regulations depending on the volume spilled. As a BMP, Ursa tracks and cleans up all spills, including those that are not reportable.</li> <li>• <b>SPILLS / INCIDENTS</b> - Spills will be managed in accordance with Ursa's SPCC plan, COGCC rules 317b and 604 including prevention, spill containment and monthly inspections. High level alarms will be installed on production tanks.</li> </ul>
6	Dust control	<ul style="list-style-type: none"> <li>• 604.c.(2)S. - Access roads • <b>DUST CONTROL</b> - The pad and access road will be graveled to reduce fugitive dust and maintained as required by COGCC rules. In addition, water and other dust suppressants are used as required, dependent upon the level of activity, moisture conditions, etc. throughout all phases of operations</li> <li>• <b>REMOTE MONITORING</b> - Remote monitoring will be used to reduce truck traffic, fugitive dust to the extent practical.</li> </ul>
7	Construction	<ul style="list-style-type: none"> <li>• 604.c.(2)E.iii. - Multi-well Pads • Access road will be maintained as an all-weather access route for operator and emergency response.</li> <li>• 604.c.(2)M. - Fencing requirements • Fencing will be installed per the surface use agreement.</li> <li>• 604.c.(3)B.i. - Berm Construction (Exception Zone) • A steel ring berm will be used.</li> <li>• 604.c.(3)B.ii. - Berm Construction (Exception Zone) • The berm will be lined in accordance with Rule 604.c.(3)B.ii.</li> <li>• 604.c.(3)B.iii. - Berm Construction (Exception Zone) • As this location is within a 317b area, a tertiary berm will be constructed at the northern sides of the location. This location will not be used as a remote temporary tank farm for other locations; therefore the berm will accommodate 100% containment of the total volume of all tanks to conduct completions at this location.</li> <li>• 604.c.(3)B.iv. - Berm Construction (Exception Zone) • As this location meets the substantive criteria for an Urban Mitigation Area and is located in an exception zone setback, no more than 2 oil tanks will be located within a berm.</li> <li>• 604.c.(2)G. - Berm construction (Buffer Zone) • All production equipment to include separators, produced water and condensate tanks, pipelines and flowlines will be constructed and managed in accordance with COGCC 604 c.(2).G, 605 and 1100 Series Rules.</li> <li>• 604.c.(2)R. - Tank specifications • <b>VISUAL IMPACTS</b> - Above-ground facilities (e.g. production tanks) will be managed to minimize visual effects (e.g. painted to blend with environment)</li> <li>• 604.c.(2)R. - Tank specifications • <b>SPCC / CONTAINMENT</b> All production tanks and tanks used for completions activities will be installed, labeled, contained, operated, and decommissioned in accordance with Ursa's SPCC/Containment Plan, which is required by EPA regulations (40 CFR 112). The plan, in combination with Ursa's Spill Prevention and Management plan, addresses COGCC 600 and 900 Series Rules, among others, regarding the management of tanks.</li> </ul>
8	Noise mitigation	<ul style="list-style-type: none"> <li>• 604.c.(2)A. - Noise • <b>AESTHETICS AND NOISE</b> - Lighting, noise, odors, dust and related nuisances are managed in accordance with COGCC 600 and 802, 803, 804 and 805 Series Rules, and in accordance with Ursa policies, procedures and checklists. Additional noise monitoring above and beyond COGCC regulations may be conducted by Ursa on a voluntary basis.</li> </ul>
9	Odor mitigation	<ul style="list-style-type: none"> <li>• 604.c.(2)C. - Green Completions – Emission Control Systems • <b>AIR &amp; ODORS</b> - Combustor controls will be used to mitigate odors from production tanks. Ursa will perform inspections on at least a monthly basis to ensure potential emissions sources are properly managed. In addition, Ursa's pumper crew inspects each location on a daily basis.</li> </ul>



10	Drilling/Completion Operations	<ul style="list-style-type: none"> <li>• 604.c.(2)E.i. - Multi-well Pads • Drilling multiple wells from this location using directional / horizontal drilling will be implemented to avoid the need for additional well pads; reducing potential environmental impacts to include habitat loss and fragmentation, noise, traffic concerns, and related impacts to air, land and water.</li> <li>• 305.h. - Buffer Zone Move-in, Rig-up Notice • MIRU - Unless waived, Notice to all Building Unit owners will be sent at least 30 days, but no more than 90 days within the 1000' Buffer Zone prior to the Move-In, Rig-Up of the drilling rig when more than 1 year has elapsed since previous notice or since drilling activity last occurred, or if no notice had previously been required in accordance with the four examples provided in the COGCC MIRU policy.</li> <li>• 604.c.(2)B.ii-v. - Closed Loop Drilling Systems – Pit Restrictions • No stimulation or flowback pits will be constructed.</li> <li>• 604.c.(2)B.i. - Closed Loop Drilling Systems – Pit Restrictions • A closed-loop (pitless) drilling system will be used; No cuttings pit will be constructed; cuttings will be hauled to an approved waste facility (see Waste Management Plan Summary – Attachment J(1).</li> <li>• 604.c.(2)H.ii. - Blowout preventer equipment (“BOPE”) • BOPE will meet minimum requirements per Rule 604.c.(2)H.ii.</li> <li>• 604.c.(2)I. - BOPE testing for drilling operations • BOPE testing will be completed in accordance with Rule 604.c.(2)I.</li> <li>• 604.c.(2)J.i. - BOPE for well servicing operations • Adequate blowout prevention equipment will be used on all well servicing operations.</li> <li>• 604.c.(2)J.ii. - BOPE for well servicing operations • Backup stabbing valves will be used on well servicing operations during reverse circulation. Valves will be pressure tested before each well servicing operation in accordance with Rule 604.c.(2)J.ii.</li> <li>• 604.c.(2)L. - Drill stem tests • Closed chamber drill stem tests will be completed unless prior approval for another method is recieved.</li> <li>• 604.c.(2)O. - Loadlines • All loadlines will be bullplugged or capped.</li> <li>• 604.c.(2)Q. - Guy line anchors • All guy line anchors left buried for future use will be identified as required per Rule 604.c.(2)Q.</li> <li>• TEMPORARY COMPLETIONS FACILITIES - Completions at the location may be supported by staging temporary tanks / water pumping station at adjacent existing location(s). At the time of application support facilities are anticipated at the BMC D pad. This will support lease operation as authorized under COGCC regulations. This will eliminate the need for additional surface disturbance. Water will be transferred between the locations via buried waterline (or temporary surface line). Buried water pipeline infrastructure is used to transport flowback water where water lines exist in close proximity to the well pad will be installed concurrently with the gas pipeline infrastructure where possible. [No waterline infrastructure currently exists, but is planned to be installed prior to completing at the location.]</li> <li>• 604.c.(2)C.i. - Green Completions – Emission Control Systems • AIR &amp; ODORS - Well completions will utilize flowback completion technologies and/or flares to reduce odors from plug drillout, and venting of salable and non-salable gas. No stimulation or flowback pits will be constructed. Green completions will be used for this well.</li> <li>• CHEMICAL USE - All chemicals used will be tracked and reported in accordance with COGCC rules and submitted through FracFocus within 120 days of initiating well stimulation.</li> <li>• 604.c.(2)C.ii. - Green Completions – Emission Control Systems • WASTE MANAGEMENT OF WATER - Flowback water used for well completions will be recycled and treated to the maximum extent practical at the location. Water that can't be recycled will be injected through the use of wells approved by COGCC and Garfield County, or transported via truck to the COGCC and Garfield County approved Wasatch E&amp;P Facility.</li> <li>• 604.c.(2)K. - Pit level indicators • WASTE - No stimulation or flowback pits will be constructed.</li> <li>• 604.c.(2)C.iii.aa. - Green Completions – Emission Control Systems • Flowback tanks will be adequately sized equipment to handle 1.5 times the largest flowback volume of gas experienced in a ten (10) mile radius</li> <li>• 604.c.(2)C.iii.bb. - Green Completions – Emission Control Systems • Flowback tanks will employ valves and porting available to divert gas to temporary equipment or to permanent flaring and oxidizing equipment</li> <li>• 604.c.(2)C.iii.cc. - Green Completions – Emission Control Systems • Flowback tanks will be equipped with auxiliary fuel with sufficient supply and heat to sustain combustion or oxidation of the gas mixture when the mixture includes non-combustible gases</li> </ul>
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- Completions will typically be conducted during daylight hours.
- 604.c.(2)C.ii. - Green Completions – Emission Control Systems • WATER RECYCLING - Produced / flowback water used for well completions will be recycled and treated to the maximum extent practical at the location. Water that can't be recycled will be injected through the use of wells approved by COGCC and Garfield County, or transported via truck to the COGCC and Garfield County approved Wasatch E&P Facility.
- One of the first wells drilled on the pad will be logged with open-hole Resistivity Log and Gamma Ray Log from TD into the surface casing. All wells on the pad will have a cement bond log with gamma-ray run on production casing (or on intermediate casing if production liner is run) into the surface casing. The Form 5, Completion Report, for each well on the pad will list all logs run and have those logs attached. The Form 5 for a well without open-hole logs shall clearly state "No open-hole logs were run" and shall clearly identify (by API#, well name & number) the well in which openhole logs were run.

Total: 10 comment(s)

### **Applicable Policies and Notices to Operators**

Policy
Notice Concerning Operating Requirements for Wildlife Protection. <a href="http://cogcc.state.co.us/documents/reg/Policies/Wildlife_Notice.pdf">http://cogcc.state.co.us/documents/reg/Policies/Wildlife_Notice.pdf</a>

### **Attachment Check List**

<b><u>Att Doc Num</u></b>	<b><u>Name</u></b>
400927766	FORM 2 SUBMITTED
400954683	DEVIATED DRILLING PLAN
400954685	WELL LOCATION PLAT
400954687	LEASE MAP
400954690	SURFACE AGRMT/SURETY
400954692	EXCEPTION LOC REQUEST
400954693	DIRECTIONAL DATA
400960932	PROPOSED BMPS
400964594	LEGAL/LEASE DESCRIPTION

Total Attach: 9 Files

### **General Comments**

<b><u>User Group</u></b>	<b><u>Comment</u></b>	<b><u>Comment Date</u></b>

Total: 0 comment(s)