

Yater - Timeline of Key Dates and Actions Regarding Violation

Inspection(s)	# 680200013 & 680200023
Location ID	# 159652
Date	Actions / Comments
10/19/2015	Due to recent odor complaints received from the Knupp's, Ursa had HCSI (third party air consultants) perform an off-schedule (non-compliance) IR inspection at Yater, Watson Ranch B and Monument Ridge locations with Ursa's production manager, Shane Vaughn. During this inspection, leaks were detected on the production tanks. Despite maintenance and replacing hatch seals, the leaks persisted. Shane Vaughn ordered new thief hatches (Model 1000 Lockdown 8" - screw down style) for all production tanks at the Monument Ridge, Watson Ranch B and Yater locations. These parts were ordered from Tammeri Cody with Energy Equipment Supply & Services. Tammeri mentioned in an email that the shipping would be 3-4 weeks, Shane replied, "get them coming as soon as possible".
11/20/2015	Tammeri emailed Shane to make him aware that the parts arrived. Shane went down to pick them up and noticed they were not the correct parts that were ordered and would not work. Shane had Tammeri order the correct parts and they were ordered the same day – again with a 3-4 week delay. Note: Energy Equipment & Supply ordered the wrong parts – not Ursa.
12/2/2015	A note was sent to Shane from Tammeri indicating the parts would arrive on 12/14/15.
12/7/2015	COGCC conducted inspection (Doc #680200013) at Yater pad after complaint received (verbally?) from Knupps. Kirby Winn and Shaun Kellerby both verified the odors.
12/8/2015	Ursa received inspection (Doc #680200013) from COGCC at 4:54pm.
12/8/2015	Knupp Odor complaint was formally filed with COGCC (Doc #200438219)
12/8/2015	Ursa met during morning Operations meeting and discussed odors and reviewed operations plan. Shane Vaughn and Dwayne Knudson were mobilized immediately to the Yater pad after hearing about the inspection from MCS (contractor onsite during 12/7/15 inspection). A follow up summary email was sent to COGCC with observations. A small leak on the production tank gauge access point (telemetry) was fixed with the addition of new parts. Gauge hatches (thief hatches) were observed to be leaking as well. Maintenance activities were performed including replacing thief hatch gaskets (seals) and utilizing the large volume completions incinerators on location to assist with emission reduction.
12/9/2015	Knupp called in odor complaint. Kirby Winn advised Knupp that Ursa had a dump stuck causing odor in BM area the night of 12/9/15.
12/9/2015	After investigating the odor complaint. Ursa did note that a dump was stuck in one of the separators at the Monument Ridge location, which sends the fluids from separator to the tanks. When this happens, the tanks emissions controls get overwhelmed by the pressure and the PRV is usually activated, releasing gas. This is a very unusual event and this equipment had no history of ever sticking prior.
12/9/2015	Ursa submitted Form 42 (Doc #400950739) to close out CA's after repairs were made. Email was submitted stating efforts made including replacing the gauge access point bushings and replacement of the thief hatch gaskets.

12/10/2015	Ursa revised well automation to shut in the well if a change of pressure is detected (dump stuck). This will minimize or completely reduce the chance of this incident from occurring in the future.
12/10/2015	Ursa connected the emissions control line to two additional large volume incinerators used during completions. This assisted in relieving the existing combustors by keeping pressures down.
12/10/2015	Ursa hired "night watch" for Battlement Mesa - this position is responsible to ensure equipment is running in proper order and ensure security overnight.
12/10/2015	COGCC/GarCo consulted with CDPHE on potential Reg. 7 issues.
12/10/2015	Ursa requested a meeting with the parties involved (Ursa, COGCC and GarCo). The meeting was held on the 10th in the afternoon.
12/10/2015	Ursa implemented new process for production tanks. Hatches will no longer be opened to "stick tanks" during flowback operations, automation and telemetry will be used exclusively to reduce odors.
12/11/2015	COGCC Inspection (Doc #680200023, Received by Ursa 12/15/15) indicated leaks around gauge hatches on production tanks still present and verified with IR camera.
12/11/2015	Two other inspections were performed at the Watson Ranch B (Doc #980200015) and Monument Ridge (Doc #680200028) locations with similar findings.
12/11/2015	Ursa reached out to COGCC's Margaret Ash to request information on flowback operations from DJ operators as mentioned in the 12/10/15 conference call. Ms. Ash sent information for Bonanza Creek and others. Ursa's operations and completions team reviewed the Bonanza flowback process and determined Ursa had a very similar process to what was "award winning" process by Bonanza.
12/15/2015	Ursa received inspection (Doc #680200023) from COGCC, mentioned above.
12/16/2015	Ursa installed and tested new "screw down" style thief hatches on all production tanks for the Yater.
12/17/2015	Email received by COGCC from Knupp's advising continued odor problems in the Battlement Mesa area.
12/18/2015	Form 42 was submitted (Doc # 400957331) to close out CA's from the second inspection (# 680200023).
12/18/2015	COGCC spent the evening of the 18th searching for odor sources in the Battlement area. Staff made observations on several locations and looked for sources of odor on Ursa locations; Monument Ridge, Yater and Watson Ranch B pads. No odors were observed and no inspections were officially entered.
12/20/2015	COGCC sent email to Kirby stating the APCD had indicated no Reg 7 issues. There was a concern that "the production tanks were not designed or not being operated in manner that minimizes leakage and controls emissions".
12/21/2015	Ursa reviewed and verified that tanks are infact being operated per designed specifications and Ursa's flowback process is equal to if not better than the "award winning" Bonanza Creek's process.
12/21/2015	HCSI performed a followup IR inspection and noted no leaks detected at the Yater, Watson Ranch B and Monument Ridge pads.

12/21/2015	Ursa sent email to Mr. Kellerby explaining what actions Ursa took to close out the corrective actions. The repairs were made from the first inspection by installing new thief hatch seals along with the other items mentioned. The leak persisted despite maintenance efforts. Once the new style hatches were made available, the problem was fixed. Ursa also commented on the CA related to not following proper COA's. Ursa's flowback process was explained. No response received from this communication.
2/9/2016	NOAV issued to Ursa (Doc # 400976773).