



January 19, 2017

Michael Warren
CPW Northwest Region
711 Independent Ave.
Grand Junction, CO 81501

RE: Ursa Operating C-24O pad Timing Limitations

Dear Mr. Warren:

Ursa Operating Company (Ursa) respectfully requests an exception to any seasonal big game timing restrictions for Ursa's Boies Ranch C-24O well pad beginning in March 2017. As previously discussed with you (see Attachment A email), the considerations supporting this exception request are as follows:

- The Boies Ranch C-24O is an existing well pad with four producing wells on privately owned surface. The mineral estate directly underlying the well pad is also privately owned. The Federal lease to be drilled will be drilled directionally from the existing private pad, eliminating the need for construction of an additional well pad on Federal surface overlying the Federal lease.
- The well pad is only approximately 600 feet off of County Road 26, which is open to traffic year-round. There are many producing well pads in the vicinity so this portion of County Road 26 sees a relatively high volume of traffic associated with oil & gas production, as well as from hunters and other user groups during certain times of year.
- The well pad, while located within Colorado Parks and Wildlife (CPW) mapped mule deer and elk winter range, is not within COGCC's mapped Sensitive Wildlife Habitat for mule deer or elk. Additionally, most Federal leases at the elevation of the Boies Ranch C-24O in the area do not contain timing restrictions for mule deer or elk, as this was historically considered to be a briefly used transition zone between higher-elevation summer ranges and lower-elevation winter ranges.
- An exception to any seasonal big game timing restrictions would allow Ursa to develop the Federal well(s) and other fee well(s) on the pad in the most efficient manner possible and prevent the need for additional disruptive rig mobilization and transport as well as additional construction activities at the pad location at some later date. In meeting with BLM in December, the Meeker office deferred to the CPW as this location is on fee surface.

Ursa appreciates your consideration of this request. If you have any questions or require further information in order to grant this request, please don't hesitate to contact me at (720) 425-0303. Should you concur, feel free to sign below, unless an alternate form of documentation or approval is required.

Rob Bleil, Ursa Regulatory and Environmental Manager

CPW concurs with this request and grants a waiver of timing limitations for the subject location:

Michael Warren, CPW Energy Liaison, Northwest Region

Date

cc: Jennifer Lind, Ursa Regulatory Analyst



Attachment A

On Dec 14, 2016, at 11:45 AM, Warren - DNR, Michael <michael.warren@state.co.us> wrote:

Rob,

I have reviewed your request to change priorities for drilling from the B 30H to the C240 pad. Both pads are existing locations and both pads are located in mule deer critical winter range; however, both pads are located close to County Road 26 and section 24 has six permitted/existing pad locations along with numerous other existing pads up and down Black Sulphur Creek. Based on the current conditions surrounding the two existing pads, we (CPW) are supportive of Ursa drilling on either pad during the period that is described as winter timing restrictions (December 1 through April 15). This approval of winter drilling is based on the condition that BLM does not have any timing limitations for the mineral leases - if applicable.

Please let me know if you have questions.

Michael

Michael Warren
Energy Liaison
Northwest Region