



BMC F Pad Attachment J(2) Waste Management Plan

This plan is being submitted as an attachment in accordance with COGCC Rule 303.b (3).

General Information

Ursa Operating Company LLC has developed and implemented a comprehensive waste management plan to address Exploration and Production (E&P) and other wastes related to its operations in the Piceance Basin, Colorado. This plan provides an overview of key points relative to Form 2A approval, based on Ursa's comprehensive plan.

E&P wastes are not regulated (i.e. exempt) as hazardous wastes by the Environmental Protection Agency (EPA) (40 CFR 261) or by the Colorado Oil and Gas Conservation Commission (COGCC). COGCC manages E&P wastes in the State of Colorado. Both agencies publish a list of E&P exempt wastes on their websites. To qualify as an E&P waste, the waste must be generated during the drilling, completions, or production operations. These wastes must be managed (treated, stored, transported and disposed of) in accordance with COGCC, County and municipal regulations, and land use codes and ordinances.

Non-E&P Wastes are those that are not generated as part of Oil and Gas downhole operations, and are generally classified as non-hazardous or hazardous. These wastes must be managed in accordance with Colorado Department of Public Health and Environment (CDPHE) regulations, and County and Local landfill or waste disposal facility requirements.

NOTE: Chemicals used for stimulation and completions are not considered wastes until they are introduced (i.e. used) into the completions phase of operations. However, they must be managed in accordance with EPA, COGCC and CDPHE regulations, including posting of Material Safety Data sheets (MSDS). The MSDS provides chemical information, and safety and environmental actions to be taken in the event of an exposure or spill.

Construction Wastes

No E&P wastes are generated during construction activities. Wastes primarily generated are typical of most household or commercial trash that can be disposed of at local landfills. Equipment maintenance and servicing wastes (oil, hydraulic fluids, etc.) are not allowed to be



managed on Ursa's locations, and must be recycled or disposed of in accordance with CDPHE regulations.