



1600 Broadway, Suite 2600
Denver, CO 80202

April 4, 2018

Colorado Oil & Gas Conservation Commission
The Chancery Building
1120 Lincoln Street, Suite 801
Denver, CO 80203

Attn: Mrs. Julie Murphy, Director

RE: 502.b. Variance Request to Rule 603.a.(1)

Boies Ranch B-30H FED Pad (Location ID: **336040**)
Township 2 South, Range 97 West, 6th P.M.
NESE of Section 30
Garfield County, Colorado

Dear Director Murphy,

Please let this letter serve as a request for Director approval of a 502.b. variance for the Boies Ranch B-30H FED (Location ID: **336040**) Pad and Wells listed below.

Ursa Operating Company LLC (Ursa) proposes to place the wells listed below on an existing pad, at a location less than 200 feet from a public road as required by Rule 603.a.(1). The minimum proposed distance to a public road (Rio Blanco County Road 29) for a well on this location is 156 feet.

Rule 603.a.(1) states:

At the time of initial drilling, a Well shall be located not less than two hundred (200) feet from buildings, public roads, major above ground utility lines, or railroads.

Ursa does not believe that the requested variance violates the basic intent on the Oil and Gas Conservation Act as there are no anticipated impacts to public health, safety, welfare or the environment associated with the proposed well locations on the Boies Ranch B-30H FED pad. County Road 29, also known as Fawn Creek Road, is a rural county road that does not have a lot of public use. The majority of vehicle use on this road is Ursa field personnel. There is very low risk to public safety by being less than 200 feet from County Road 29 due to the very low level of vehicles on this road. As a proactive measure, Ursa will mitigate risk of public safety concerns for vehicles accessing County Road 29 in Rio Blanco, Colorado. The following traffic mitigation signage will be utilized for Ursa Operating Company's operations on the proposed Boies Ranch B-30H FED pad. High-Viz signage with lighting will be installed to allow for interpreting the verbiage during all hours of the days and/or during adverse weather conditions. Signage will include current operations being conducted, EMS contact numbers, Ursa's 24-Hour emergency contact number, staffed by a live human operator, with contact numbers for all essential Ursa supervisors. All necessary location coordinates will be provided to EMS dispatchers. Staging areas for signs and lighting will be to the North and South of the entrance for the proposed Boies Ranch B-30H FED pad and at the

turnoff of County Road 5, Rio Blanco, to County Road 29, to ensure all traffic has ample notification of operations being conducted in their areas of travel. Ursa will ensure our onsite supervisors are properly trained on the functionality of the signage and protocols for contacting responders in the event an incident arises.

Rule 605.a.(2) states:

(2) Tanks shall be located at least two (2) diameters or three hundred fifty (350) feet, whichever is smaller, from the boundary of the property on which it is built. Where the property line is a public way the tanks shall be two thirds (2/3) of the diameter from the nearest side of the public way or easement.

Planned tanks to be installed on this location will be 12'W x 20'H (400 Bbl capacity) and will be greater than two thirds (2/3) the diameter of the tanks away from the nearest side of the public way per rule 605.a.(2) as illustrated on the planned location drawing.

Ursa Operating Company LLC is the surface owner. There are no buildings or building units within a 1000' of this pad. This location is an existing pad that was built by the previous operator. Ursa intends to re-occupy the pad to the extent of the original limit of disturbance as indicated on the location drawing. Interim reclamation was done on the northeast and southwest portions of the pad. Ursa will re-disturb these areas up to the limits of original disturbance. The pad currently has several limiting factors that prevent the wells from complying with the 200' safety buffer.

- 1) There are existing pier casings and plugged conductors below grade on the pad which prevent us from moving our planned well line further from the public road. Please see enclosed drawing.
- 2) The pad cannot be expanded as the location is bound by a road directly east of the pad and a creek directly west of the pad.
- 3) County Road 29 is in Rio Blanco County, Colorado. Ursa has notified county officials of this matter and obtained a waiver from the county for this variance request. The Waiver is enclosed with this letter.

| Pad Name | Pad Location (Reference Pt) | Form 2A Doc # | Distance to Public Road |
|-----------------------------------|--|--------------------------|------------------------------------|
| Boies Ranch B-30H FED Pad | 2110' FSL, 1215' FEL | 401464292 | 156' |
| Well Name | Well Location (Surface) | Form 2 Doc # | Distance to Public Road |
| Boies Ranch B-30H FED 31B-30-2-97 | 2209' FSL, 1121' FEL | 401434146 | 166' |
| Boies Ranch B-30H 11D-29-2-97 | 2217' FSL, 1115' FEL | 401434545 | 166' |
| Boies Ranch B-30H FED 31A-30-2-97 | 2225' FSL, 1109' FEL | 401434656 | 166' |
| Boies Ranch B-30H 24D-19-2-97 | 2240' FSL, 1096' FEL | 401434684 | 156' |
| Boies Ranch B-30H 14C-20-2-97 | 2234' FSL, 1089' FEL | 401434691 | 156' |
| Boies Ranch B-30H 34B-19-2-97 | 2226' FSL, 1095' FEL | 401434699 | 156' |
| Boies Ranch B-30H 44D-19-2-97 | 2218' FSL, 1101' FEL | 401434721 | 156' |
| Boies Ranch B-30H 34D-19-2-97 | 2211' FSL, 1107' FEL | 401434725 | 156' |
| Boies Ranch B-30H 41B-30-2-97 | 2203' FSL, 1114' FEL | 401434727 | 156' |



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| | | | |
|-------------------------------|----------------------|-----------|------|
| Boies Ranch B-30H 11C-29-2-97 | 2232' FSL, 1103' FEL | 401443505 | 166' |
|-------------------------------|----------------------|-----------|------|

Should you have any questions, please contact me at (720) 508-8362 or cmcrickard@ursaresources.com
Thank you for your assistance in this matter.

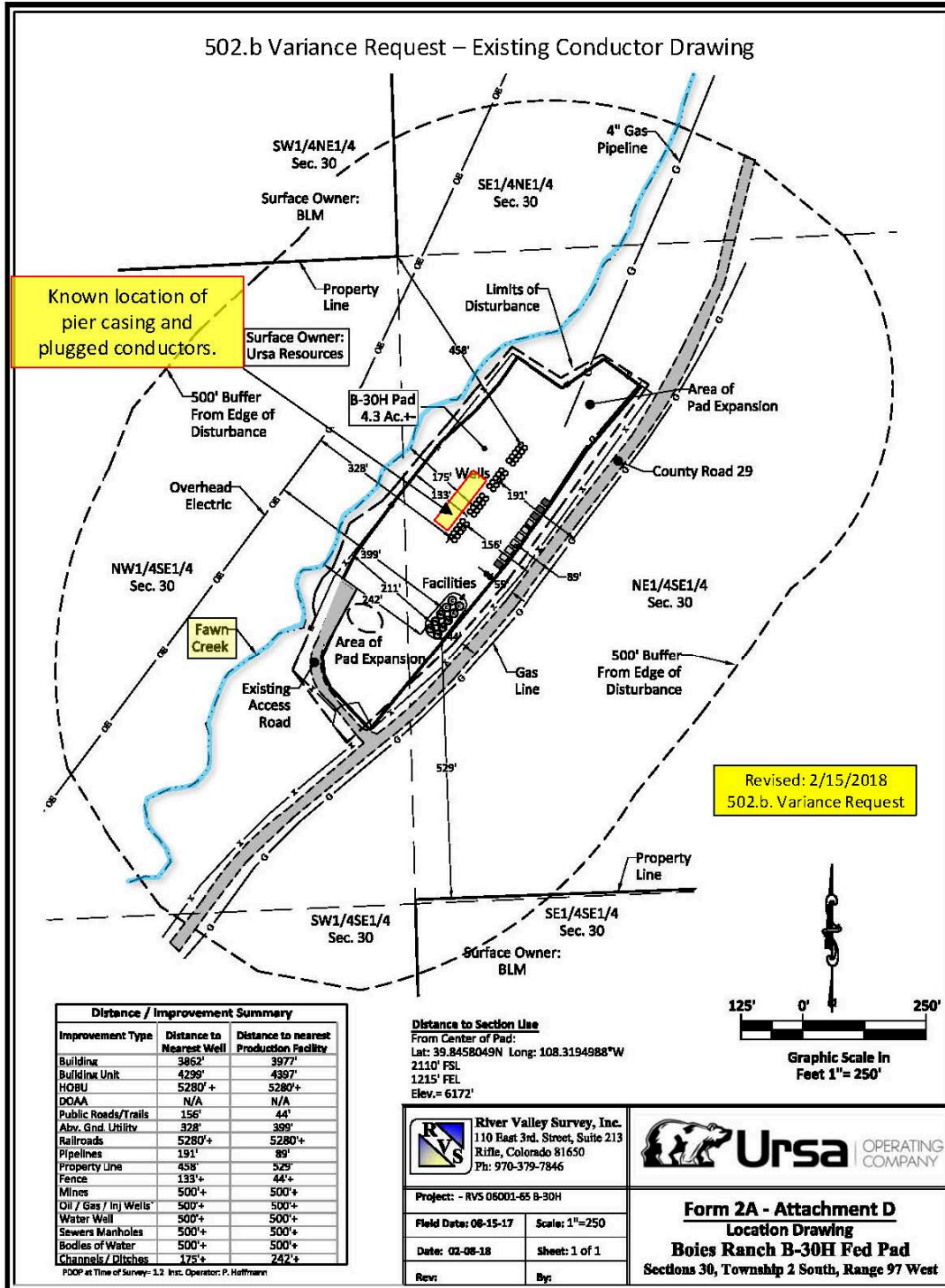
Sincerely,

Ursa Operating Company LLC

Chris McRickard

Regulatory Manager

Enclosures: Existing Conductor Drawing
Rio Blanco County Waivers





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1600 Broadway, Suite 2600
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11/27/2017

Mr. Lannie Massey
Natural Resources Liason, Rio Blanco County
570 2nd Street
Meeker, CO 81641

RE: Waiver of Rule 603.a.(1) – ACTION REQUIRED
Boies Ranch B-30H Pad (COGCC Location ID: 336040)
Section 30, Township 2 South, Range 97 West, 6th P.M. (NE¼SE¼)
Rio Blanco County, Colorado

Mr. Massey:

Ursa Operating Company LLC (“Ursa”) respectfully requests a waiver from Rio Blanco County of Colorado Oil and Gas Conservation Commission’s (“COGCC”) Rule 603.a.(1) which states the following:

COGCC Rule 603.a.(1):

“At the time of initial drilling, a Well shall be located not less than two hundred (200) feet from buildings, public roads, major above ground utility lines, or railroads. Rule 604 setback requirements apply with respect to Building Units and Designated Outside Activity Areas.”

Ursa is planning to re-occupy the Boise Ranch B-30H Pad (COGCC Location ID: 336040) upon approval from the COGCC. Our planned well locations will be closer than 200’ to a public road as stated in COGCC Rule 603.a.(1). The nearest planned well on the pad will be 156’ from Cr 29.

The location of the existing pad, as indicated above, has been built next to CR 29 “Fawn Creek Road” and was built by a previous operator. Existing pad conditions prevent us from moving our planned wells further west to be in compliance with Rule 603.a.(1). The existing location is constrained by CR 29 to the east of the pad and by a creek directly to the west of the pad. In addition, the pad has existing conductors set that prevent us from moving our planned well locations further west.

As the party responsible for maintenance of CR 29, Ursa requests the execution of the waiver language below to allow the planned Boise Ranch B-30H wells (at 156’ from CR 29) to be permitted as proposed.

Thank you for your time and consideration in this matter. If you have any questions or comments, please contact me at (direct) 720-508-8362 or via email at cmcrickard@ursaresources.com. Please sign and date below. Please return a scanned copy to me at cmcrickard@ursaresources.com.

Sincerely,
Ursa Operating Company LLC

Chris McRickard
Regulatory Manager

www.ursaresources.com

(720) 508-8350 Telephone

(720) 508-8368 Fax



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Denver, CO 80202

11/27/2017

Waiver of Rule 603.a.(1)

THE UNDERSIGNED WAIVES RULE 603.a.(1) AS IT APPLIES TO THE PLANNED WELL LOCATIONS OF THE BOISE RANCH B-30H PROPOSED WELLS AND APPROVES THE SURFACE LOCATION TO BE LESS THAN 200' FROM A PUBLIC ROAD (CR 29).

Mr. Lannie Massey
Natural Resources Liason, Rio Blanco County:

Signature: 

Date: 11/27/2017

