



1600 Broadway, Suite 2600
Denver, CO 80202

January 7, 2019

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

Attn: 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 PM
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 Pad and Wells listed below. (COGCC Location ID: **336040**)

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 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 pad.

Ursa Operating Company LLC is the surface owner. There are no buildings or building units within a 1000' of this pad. Vehicle traffic is limited to our own operations as the pad is located on private property. This location has an existing pad that was built by the previous operator which Ursa intends to re-occupy without expansion of the pad. 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 west. These plugged conductors are closer than 200' as previously permitted prior to a rule change of 603.a.(1). 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.

Pad Name	Pad Location (Reference)	Form 2A Doc #	Distance to Public Road
Boies Ranch B-30H FED Pad	2110' FSL, 1215' FEL	401464292	156'
Well Name	Well Location	Form 2 Doc #	Distance to Public Road
Boies Ranch B-30H 41D-30-02-97	2234' FSL, 1088' FEL	401645741(A)	156'
Boies Ranch B-30H 42A-30-02-97	2226' FSL, 1095' FEL	401645745(A)	156'
Boies Ranch B-30H 42B-30-02-97	2218' FSL, 1101' FEL	401886074	156'
Boies Ranch B-30H 42C-30-02-97	2211' FSL, 1107' FEL	401886241	156'
Boies Ranch B-30H 42D-30-02-97	2190' FSL, 1137' FEL	401886288	166'
Boies Ranch B-30H 43A-30-02-97	2176' FSL, 1143' FEL	401886304	166'
Boies Ranch B-30H 43B-30-02-97	2168' FSL, 1142' FEL	401886319	166'
Boies Ranch B-30H 43C-30-02-97	2175' FSL, 1150' FEL	401886345	166'
Boies Ranch B-30H 43D-30-02-97	2167' FSL, 1156' FEL	401886401	166'
Boies Ranch B-30H FED 21C-30-02-97	2240' FSL, 1096' FEL	401645730(A)	166'
Boies Ranch B-30H FED 21D-30-02-97	2232' FSL, 1103' FEL	401645731(A)	156'
Boies Ranch B-30H FED 22A-30-02-97	2225' FSL, 1109' FEL	401886445	166'
Boies Ranch B-30H FED 22B-30-02-97	2217' FSL, 1115' FEL	401886485	166'
Boies Ranch B-30H FED 22C-30-02-97	2184' FSL, 1129' FEL	401886501	156'
Boies Ranch B-30H FED 22D-30-02-97	2176' FSL, 1136' FEL	401886520	156'

(A) = Designates approved APD.

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

