

June 2, 2020

Mr. Jeff Robbins, Director
Colorado Oil and Gas Conservation Commission
1120 Lincoln Street, Suite 801
Denver, Colorado 80203

**RE: Rule 502.b: Variance Request from 805.b.(3)B.v.
Vulcan 6-64 10-8 Pad: SENW Section 10, Township 6 South, Range 64 West
Form 2A Doc #401805353
Elbert County, Colorado**

Dear Director Robbins,

GMT Exploration Company, LLC (GMT) is requesting a Rule 502.b. Variance to Rule 805.b.(3)B.v.

Rule 805.b.(3).v states that all salable quality gas shall be directed to the sales line as soon as practicable or shut in and conserved. Temporary flaring or venting shall be permitted as a safety measure during upset conditions and in accordance with all other applicable laws, rules, and regulations.

GMT is requesting to flare one well from the Vulcan 6-64 10-8 Pad as an exploratory well test for sufficient volume and quantity gas to connect a sales line. The test is anticipated to run for 6 months. The gas will be produced (treated) through a Mechanical Refrigeration Unit (MRU), in order to remove additional hydrocarbons (NGL's) and reduce the overall emissions to a projected total of 40.43 tons of VOC's by the end of the 6 month test, or an annual projected total of 61.33 tpy, with the anticipated rate of decline.

SB 19-181: Required Objective Criteria #14 is unchanged. A Request to Vent or Flare (Form 4) from a location within 1,500' of a Building Unit or High Occupancy Building Unit or within the Denver Metro/North Front Range 8-Hour Ozone Nonattainment Area remains not applicable, as there is no building unit within 1500' and the location is not in the Denver Metro/North Front Range 8-Hour Ozone Nonattainment Area.

Pursuant to Rule 604.c.(2)C.iii, temporary flowback flaring and oxidizing equipment shall include adequately sized equipment to handle 1.5 times the largest flowback volume of gas experienced in a ten (10) mile radius; valves and porting available to divert gas to temporary equipment or to permanent flaring and oxidizing equipment; and auxiliary fuel with sufficient supply and heat to sustain combustion or oxidation of the gas mixture when the mixture includes noncombustible gases. GMT will comply with Rule 604.c.(2)C.iii.

GMT will comply with the provisions of flaring Rule 912; the treated flared gas is not anticipated to contain more than one (1) ppm of hydrogen sulfide.

GMT will operate wells and equipment in such a manner that odors and dust do not constitute a nuisance or hazard to public welfare in accordance with Rule 805.b.(1).

GMT will use a CDPHE approved flaring method and site-specific permitting required by the CDPHE.



GMT respectfully requests the COGCC approve the flaring request and Form 2A for the Vulcan 6-64 10-8 Pad. Many thanks for your consideration of this matter.

Respectfully,

A handwritten signature in black ink, appearing to be "J. Garrett", written over a light gray horizontal line.

Justin Garrett, Regulatory Analyst
Agent for GMT Exploration Company, LLC