

Lesser Impact Area Exemption Requests

North Cheyenne Oil and Gas Development

Travis 1-10 Pfaffly 1-12

The information below describes Lesser Impact Area exemption requests for Plans required under Rule 304.c for Navex Resources, LLC's proposed North Cheyenne oil and gas development in Kit Carson County, Colorado. The development is proposed in the following locations:

Travis 1-10 SE ¼ NE ¼ Section 10, Township 11 South, Range 45 West

Pfaffly 1-12 NW ¼ SW ¼ Section 12, Township 11 South, Range 46 West

In accordance with Rule 304.d.(1) and Colorado Oil and Gas Conservation Commission guidance (February 18, 2021), the exemption requests are based on findings that impacted resources are not present or that impacts will be so minimal as to pose no concern.

(2) Noise Mitigation Plan

Requirement	Response
Exemption Requested	Rule 304.c.(2) Noise Mitigation Plan
Resource Concern	Noise impacts to people and wildlife
Exemption Circumstance	The resource concern is not present.
Description	<p>Mapping data and on-site review demonstrate that the nearest residential building unit is approximately 1.7 miles south of the Travis 1-10 location and 1.6 miles north of the Pfaffly 1-12 location. A nest mapped as high priority habitat for ferruginous hawk within 0.5 miles of the Travis 1-10 location was changed by Colorado Parks and Wildlife (CPW) from "active" to "destroyed" in the CPW database. CPW communicated the change in status on March 28, 2022 and waived consultation per Rule 309.e.(3).C.i. The pre-application communication with CPW and detailed raptor monitoring results are provided in the CPW Pre-application Consultation Summary submitted with the Form 2A application.</p> <p>There is no other mapped habitat within 1 mile of the Working Pad Surfaces. The areas do not support habitat for species of concern. The areas are historically disturbed from active agricultural operations and dirt roads. The nearest high priority habitat is lesser prairie chicken Estimated Occupied Range, approximately 3.4 miles south of Travis 1-10 and 3.3 miles south of Pfaffly 1-12. Developing a single conventional vertical well at each location is expected to require 2 days for construction, 7 to 14 days for drilling, 6 days for completion, and 2 days for interim reclamation. Noise is not expected to pose a concern because of the distance to the nearest residential building units; the lack of species of concern; the existing disturbances from agricultural operations and dirt roads; and the short drilling and completion durations.</p>

(3) Light Mitigation Plan

Requirement	Response
Exemption Requested	Rule 304.c.(3) Light Mitigation Plan
Resource Concern	Light impacts to people and wildlife
Exemption Circumstance	The resource concern is so minimal as to pose no concern.
Description	<p>Mapping data and on-site review demonstrate that the nearest residential building unit is approximately 1.7 miles south of the Travis 1-10 location and 1.6 miles north of the Pfaffly 1-12 location. A nest mapped as high priority habitat for ferruginous hawk within 0.5 miles of the Travis 1-10 location was changed by Colorado Parks and Wildlife (CPW) from “active” to “destroyed” in the CPW database. CPW communicated the change in status on March 28, 2022 and waived consultation per Rule 309.e.(3).C.i. The pre-application communication with CPW and detailed raptor monitoring results are provided in the CPW Pre-application Consultation Summary submitted with the Form 2A application.</p> <p>There is no other mapped habitat within 1 mile of the Working Pad Surfaces. The areas do not support habitat for species of concern. The areas are historically disturbed from active agricultural operations and dirt roads. The nearest high priority habitat is lesser prairie chicken Estimated Occupied Range, approximately 3.4 miles south of Travis 1-10 and 3.3 miles south of Pfaffly 1-12. Developing a single conventional vertical well at each location is expected to require 2 days for construction, 7 to 14 days for drilling, 6 days for completion, and 2 days for interim reclamation. Lighting will be limited to rig-mounted lighting that will be cast downward during well drilling. Lighting will be removed after well drilling. The location will not be lit during completion or production.</p> <p>Light is not expected to pose a concern because of the distance to the nearest residential building units; the lack of species of concern; the short drilling duration; the removal of lighting after 7 to 14 days of well drilling; and keeping the location unlit during production.</p>