



February 9, 2022

Ms. Julie Murphy, Director  
Colorado Oil and Gas Conservation Commission  
1120 Lincoln Street, Suite 801  
Denver, Colorado 80203

RE: COGCC Rule 304.d.(2) Lesser Impact Area Exemption  
St. Croix Operating, Inc., Revenant #1 Pad  
NWNE Section 7, Township 3 South, Range 51 West  
OGDP Docket # 220200024, Form 2A Doc #402817651  
Washington County, Colorado

Dear Director Murphy,

St. Croix Operating, Inc. (St. Croix). has filed a Form 2A with the Colorado Oil and Gas Conservation Commission (COGCC) for the above referenced location. COGCC Rule 304.d. stipulates that the Director may exempt an Operator from submitting any of the information required by Rule 304.b. or any plan required by Rule 304.c. St. Croix requests an exemption from the Director for the Noise Mitigation Plan, Rule 304.c.(2), and the Light Mitigation Plan, 304.c.(3), based on evidence showing the information or plan is unnecessary because the impacted resource or resource concern is not present in the area or impacts to the resource will be so minimal as to pose no concern. Please see the attached Table for details.

Pursuant to COGCC Rule 304.d.(2), Operators may request an exemption from the Director in writing, without proceeding through the ordinary Rule 502 variance process. A request for an exemption will be provided with the Form 2A at the time the Form is submitted. This letter serves as the required exemption request.

If you have any questions or require additional information, please do not hesitate to contact me at (303) 888-4862 or via email at [jdonahue@ardorenvironmental.com](mailto:jdonahue@ardorenvironmental.com). Thank you for your consideration of this matter.

Respectfully,

Jessica Donahue

St. Croix Operating, Inc.  
 Revenant #1  
 Lesser Impact Exemption Requests

Rule Exemption Being Requested From	Resource Concern	Exemption Circumstance	Description	Rule Requirements	Requesting Exemption
304.c.(2)	Noise Mitigation	The impacted resource is not present	After reviewing maps and aerial photographs of the location's area, there are no buildings or Designated Activity Areas identified within 2,000 feet of the location.	A noise mitigation plan consistent with the requirements of Rule 423.a.	Yes
304.c.(3)	Light Mitigation	The impacted resource is not present	After reviewing maps and aerial photographs of the location's area, there are no buildings or Designated Activity Areas identified within 2,000 feet of the location.	A light mitigation plan consistent with the requirements of Rule 424.a.	Yes