



VIA EFORMS

Director Julie Murphy
Colorado Oil & Gas Conservation Commission
1120 Lincoln Street, Suite 801
Denver, CO 80203

May 9, 2022

RE: Rule 304.d. Lesser Impact Exemption Request
BNL (Enterprise) Inc.
BBB 33 SESE 2860 Wellpad
T28S R60W Sec. 33: SE/4 SE/4
Las Animas County, Colorado

Dear Director Murphy:

BNL (Enterprise) Inc. (BNL) respectfully requests that the Director grant a Lesser Impact Exemption pursuant to Colorado Oil and Gas Conservation Commission (COGCC) Rule 304.d. for the above referenced wellpad.

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 under certain circumstances:

*The impacted resource or resource concern are not present in the area; or
Impacts to the resource will be so minimal as to pose no concern.*

The Lesser Impact Area exemptions are listed on Appendix A with all applicable information as requested by COGCC.

BNL requests the Director approve the proposed Lesser Impact Exemption requests.

Please send a copy of all correspondence to Upstream Petroleum Management, Inc. at 7000 S. Yosemite St., Suite 290B, Englewood, CO 80112. Please contact me at 303-942-0506 or at agross@upstreampm.com if you have any questions.

Sincerely,

Andrea Gross
Permit Agent for BNL (Enterprise) Inc.

Your Assets / Our Expertise

- Regulatory
- Storm-water Management Plans
- Project Coordination
- Permitting
- Government Relations
- EA/EIS Assistance

BBB 33 SESE 2860 Wellpad Lesser Impact Exemption Request
Appendix A

Exemption Requested From	Resource Concern	Exemption Circumstance	Description
Rule 304.c.(2) & 423.a. Noise Mitigation Plan	Noise impacts to People and Wildlife	Impact to Resource is minimal.	This location is in a remote area. There are no major roads close to this location. A review of available map data and plats indicates the closest building unit is 2,085' (which has been unoccupied for multiple years) from the proposed working pad surface. Based on this distance from the wellpad, it is unlikely that on-site noise will adversely affect the nearest building units. Air drilling similar to what is used to drill water wells or workover rigs will be utilized. Enterprise will only drill during daylight hours if feasible.
Rule 304.c.(3) & 424.a. Light Mitigation Plan	Lighting impacts to people and wildlife	Impact to Resource is minimal.	There are no major roads close to this location. A review of available map data and plats indicates the closest building unit is 2,085' (which has been unoccupied for multiple years) from the proposed working pad surface. Based on this distance from the wellpad, it is unlikely that on-site lighting will adversely affect the nearest building units. BNL will only drill during daylight hours, therefore lighting will not impact traffic. The nearest HPH is 2,299' from the working pad surface. It is for the Timpas Creek which will not be impacted by light leaving the location.