



**VIA EFORMS**

December 22, 2022

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

RE: Rule 304.d. Lesser Impact Area Exemption Request  
GMT Exploration Company LLC  
Ragged 6-64 4 Location  
T6S R64W Sec. 4: Lot 1  
Elbert County, Colorado

Dear Director Murphy:

GMT Exploration Company LLC (GMT) respectfully requests that the Director grant the Lesser Impact Area Exemption described in Appendix A pursuant to Colorado Oil and Gas Conservation Commission (COGCC) Rule 304.d. for the above referenced Location.

COGCC Rule 304.d. provides 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 the following 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.*

GMT's requested Lesser Impact Area Exemptions are listed on Appendix A with all applicable information as requested by the COGCC. Please do not hesitate to contact me to discuss the requested Lesser Impact Area Exemptions upon your review.

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](mailto:agross@upstreampm.com) if you have any questions.

Sincerely,

Andrea Gross  
Permit Agent for GMT Exploration Company LLC

**Your Assets / Our Expertise**

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

Ragged 6-64 4 Location Lesser Impact Area 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	Impacts to the resource will be minimal.	<p>An onsite survey and review of available map data indicates the closest Residential Building Unit is 2,840 feet east from the edge of the Working Pad surface. BMPs used to mitigate impacts to the RBU include:</p> <ul style="list-style-type: none"> <li>• Drilling rig engine exhausts are pointed straight up so as not to be directed towards any occupied buildings</li> <li>• All trucks on location will be prohibited from idling when not in use to prevent unnecessary noise.</li> </ul> <p>Additionally, the Location is not within any High Priority habitats. Production facilities will be placed on the west side of the pad which is the furthest away from the RBU.</p>
Rule 304.c.(3) & 424.a. Light Mitigation Plan	Lighting Impacts to People and Wildlife	Impacts to the resource will be minimal.	<p>An onsite survey and review of available map data indicates the closest Residential Building Unit is 2,840 feet east from the edge of the Working Pad surface. Based on this distance from the wellpad, it is unlikely that on-site lighting will adversely affect the nearest building units. The distance from the Working Pad Surface to the nearest public road is 623' north. Lighting will not impact traffic.</p>