

# Lesser Impact Area Exemption Request

## Red Rocks 35-08 Red Rocks 35-11

The information below describes Lesser Impact Area exemption requests for Plans required under Rule 304.c for Desert Eagle Operating, LLC (DEO). DEO proposes to develop Oil and Gas Locations for single conventional vertical exploratory helium gas wells. The wells will be drilled with air using a water well-sized drill rig. There will be no drilling mud, hydraulic fracturing, stimulation, or flowback. The wells will be in the following locations:

Red Rocks 35-08: NE ¼ SE ¼ Section 35, Township 29 South, Range 55 West

Red Rocks 35-11: SE ¼ NW ¼, Section 35, Township 29 South, Range 55 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 greater than 1 mile from the Red Rocks 35-08 and Red Rocks 35-11 locations.</p> <p>There is no mapped High Priority 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 ranching operations, dirt roads, and oil and gas well development.</p> <p>Developing a single conventional vertical well at each location is expected to require 1 day for site preparation, 7 days for drilling, 3 days for completion, and 1 day for interim reclamation.</p> <p>Noise is not expected to be a resource concern because of the distance to the nearest residential building unit; the lack of species of concern; the existing roads and human disturbance in the area; and the short drilling and completion durations.</p>

**(3) Light Mitigation Plan**

<b>Requirement</b>	<b>Response</b>
Exemption Requested	Rule 304.c.(3) Light Mitigation Plan
Resource Concern	Light impacts to people and wildlife
Exemption Circumstance	The resource concern is not present.
Description	<p>Drilling and completion will occur during daylight hours. The location will not be lit during production.</p> <p>Mapping data and on-site review demonstrate that the nearest residential building unit is greater than 1 mile from the Red Rocks 35-08 and Red Rocks 35-11 locations.</p> <p>There is no mapped High Priority 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 ranching operations, dirt roads, and oil and gas well development.</p> <p>Developing a single conventional vertical well at each location is expected to require 1 day for site preparation, 7 for drilling, 3 days for completion, and 1 day for interim reclamation.</p> <p>Light is not expected to be a resource concern because the location will not be lit during well development or production.</p>