



November 11, 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., Dune #1 Pad
SENE, Section 28, Township 1 North, Range 50 West
OGDP Docket # 221100309, Form 2A Doc #402955772
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 attachment for further 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. Thank you for your consideration of this matter.

Respectfully,

Jessica Donahue

St. Croix Operating, Inc.
Dune #1
SENE Section 28, T1N R50W
Washington County, Colorado

LESSER IMPACT EXEMPTION – RULE 304.C.(2) and 304.c.(3)

St. Croix Operating, Inc. (St. Croix), is requesting a Lesser Impact Exemption from Rule 304.c.(2) – Noise Mitigation Plan and 304.c.(3) – Light Mitigation Plan.

This proposed location is over 2000' from any Buildings, Residential Building Units, or High Occupancy Building Units.

This location is not located within any High Priority Habitats as defined by COGCC Rule 1202.d.

Rule 304.c.(2) – the Noise Mitigation plan is being requested for a Lesser Impact Exemption because noise will not be an issue since there are no buildings or Designated Activity Areas identified less than 2,000 feet of the location. Additionally, the very short duration of both the construction and drilling phases, each being one week, do not lend itself to having an impact to the surrounding area.

Rule 304.c.(3) – the Light Mitigation plan is being requested for a Lesser Impact Exemption because noise will not be an issue since there are no buildings or Designated Activity Areas identified less than 2,000 feet of the location. Additionally, the very short duration of both the construction and drilling phases, each being one week, do not lend itself to having an impact to the surrounding area.