



December 4, 2023

Ms. Julie Murphy, Director  
Colorado Energy and Carbon Management Commission  
1120 Lincoln Street, Suite 801  
Denver, Colorado 80203

**RE: ECMC Rule 304.d.(2) Lesser Impact Area Exemption  
Bison IV Operating, LLC  
Sandy Bay OGD  
Triggerfish Pad  
OGDP Docket No.: 231200360  
Form 2A Document No.: 403550448  
Weld County, Colorado**

Dear Director Murphy,

Bison IV Operating, LLC (Bison) has filed a Form 2A with the Colorado Energy & Carbon Management Commission (ECMC) for our proposed Triggerfish Location, which is located in the SWSE quarter of Section 29, T7N, R62W.

ECMC 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. Bison respectfully requests an exemption for the Noise Mitigation Plan from the Director based on a lack of Residential Building Units, High Priority Habitats, or other receptors.

Pursuant to ECMC Rule 304.d.(2), Operators may request an exemption from the Director in writing, without proceeding through the ordinary Rule 502 variance process. This request for an exemption is provided with our Form 2A and serves as the required exemption request. If you have any questions or require additional information, please do not hesitate to contact me at [kgillen@bisonog.com](mailto:kgillen@bisonog.com) or 720-370-5737. Thank you for your consideration of this matter.

Sincerely,

Katie Gillen  
Director of Regulatory Affairs



Exemption Requested From	Resource Concern	Exemption Circumstance	Description
<p>Rule 304.c.(2)</p> <p>A noise mitigation plan consistent with the requirements of Rule 423.a.</p>	<p>Operators will submit a noise mitigation plan that demonstrates one or more proposed methods of meeting the maximum permissible noise levels described by this Rule 423 as an attachment to their Form 2As, as required by Rule 304.c.(2).</p>	<p>Impacts to the resource will be so minimal as to pose no concern.</p>	<p>The Triggerfish Location is wholly located within an agricultural area and zoned as such. The closest Residential Building Unit (RBU) is approximately 4,032 feet to the northwest. Similarly, there are no High Occupancy Building Units, Designated Outside Activity Areas, Childcare Centers, or Schools within one mile of the Location.</p> <p>Based on the 2023 Colorado Parks and Wildlife (CPW) High Priority Habitat (HPH) layers, the closest HPH (Pronghorn Winter Concentration) is approximately 1.3 miles east of the Triggerfish Pad WPS. Additionally, there are no water features or other habitat elements that would draw Pronghorn from the HPH onto the Location.</p> <p>Bison has also planned the orientation of the pre-production and production equipment within the Location to reduce potential noise during pre-production activities and production activities.</p> <p>Given the distance of potential receptors from the proposed Location, noise from pre-production or production would be so minimal as to pose no concern, and Bison is requesting a Lesser Impact Area Exemption for the Noise Mitigation Plan.</p> <p>Should Bison receive a noise-related complaint and operations are found to be out of compliance with ECMC Rules, Bison is committed to completing a Noise Mitigation Plan and installing the necessary BMPs.</p>