



VIA EFORMS

September 29, 2023

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
Invicta 3-65 28 Location
T3S R65W Sec. 28: N/2
Adams 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 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

Invicta 3-65 28 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.	An onsite survey and review of available map data indicates the closest Residential Building Unit is over 5,280' south from the edge of the Working Pad surface. Additionally, the Location is not within any High Priority habitats. This area is zoned for industrial operations only. Residential subdivisions will not be developed in this area.
Rule 304.c.(3) & 424.a. Light Mitigation Plan	Lighting Impacts to People and Wildlife	Impacts to the resource will be minimal.	An onsite survey and review of available map data indicates the closest Residential Building Unit is over 5,280' south 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 1,089' north. Lighting will not impact traffic. This area is zoned for industrial operations only. Residential subdivisions will not be developed in this area.