



VIA EFORMS

Director Julie Murphy
Colorado Energy & Carbon Management Commission
1120 Lincoln Street, Suite 801
Denver, CO 80203

April 19, 2024

RE: Rule 304.d. Lesser Impact Exemption Request
BNL (Enterprise) Inc.
Jackson 31 SENW 3054
Section 31 T30S R54W SENW
Las Animas County, Colorado

Dear Director Murphy:

BNL (Enterprise) Inc. (BNL) respectfully requests that the Director grant a Lesser Impact Exemption pursuant to Colorado Energy & Carbon Management Commission (ECMC) Rule 304.d. for the above referenced wellpad.

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 under certain 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.

The Lesser Impact Area exemptions are listed on Appendix A with all applicable information as requested by ECMC.

BNL requests the Director approve the proposed Lesser Impact Exemption requests.

Please send a copy of all correspondence to Upstream Petroleum Management, Inc. at 6494 S. Quebec St. Englewood, CO 80111. Please contact me at 303-942-0506 or at agross@upstreampm.com if you have any questions.

Sincerely,

Andrea Gross
Permit Agent for BNL (Enterprise) Inc.

cc: BNL (Enterprise) Inc.

Your Assets / Our Expertise

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

Jackson 31 SENW 3054 Wellpad Lesser Impact 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	Impact to Resource is minimal.	This location is in a very remote area. A review of available map data and plats indicates there are no building units within 3,609' from the proposed working pad surface. Based on this distance from the wellpad, it is unlikely that on-site noise will adversely affect the nearest building units. The closest public road is 3,041' from the wellpad. There is no HPH within 5,280' from the working pad surface. Air drilling, similar to what is used to drill water wells or workover rigs, will be utilized. The drilling phase for a shallow vertical well is typically short compared to horizontal wells in the DJ Basin. Adverse impacts from noise will be minimal.
Rule 304.c.(3) & 424.a. Light Mitigation Plan	Lighting impacts to people and wildlife	Impact to Resource is minimal.	A review of available map data and plats indicates the closest Building Unit is 3,609' from the proposed working pad surface. County Road 179 is 3,041' to the location. Light impacts to surrounding receptors will be minimal and temporary.