



November 1, 2023

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

RE: Rule 304.d Lesser Area Impact Exemption Request
Wavetech Helium Inc.
#1 Wavetech Furst 12-33: SWNW & NWSW Section 33, Township 14 South, Range 42
West #1 Wavetech Wulff Trust 43-5: NESE Section 5, Township 15 South, Range 42
West Cheyenne County, Colorado

Dear Director Murphy:

Wavetech Helium Inc. (Wavetech) respectfully requests that the Director grant a Lesser Impact Exemption pursuant to Energy and Carbon Management Commission (ECMC) Rule 304.d. for the above referenced Locations.

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.

Wavetech requests the Director grant the proposed Lesser Area Impact Exemption requests.

Please contact me at 303-489-1749 or at mpfister@miracleenergyconsulting.com if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Miracle Pfister". The signature is written in a cursive, flowing style.

Miracle Pfister
Sr. Regulatory Consultant for Wavetech Helium, Inc.

Appendix A

Exemption requested from: Rule 304.c.(2) & 423.a. Noise Mitigation Plan

Resource concern: Noise impacts to People and Wildlife

Exemption Circumstance: The resource concern is not present.

Description: Mapping data and on-site review demonstrate that the nearest residential building unit is greater than 1 mile from the 1 Wavetech Furst 12-33 and 1 Wavetech Wulff Trust 43-5 locations.

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 agricultural operations and accessed by dirt roads.

Developing a single conventional vertical well at each location is expected to require 1 week for site preparation, 1 week for drilling, 2 weeks for completion.

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; and the short drilling and completion durations.

Exemption requested from: Rule 304.c.(3) & 424.a. Light Mitigation Plan

Resource concern: Light impacts to People and Wildlife

Exemption Circumstance: The resource concern is not present.

Description: Drilling and completion will occur during daylight hours. The location will not have permanent lighting during production.

Mapping data and on-site review demonstrate that the nearest residential building unit is greater than 1 mile from the 1 Wavetech Furst 12-33 and 1 Wavetech Wulff Trust 43-5 locations.

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 agricultural operations and accessed by dirt roads.

Developing a single conventional vertical well at each location is expected to require 1 week for site preparation, 1 week for drilling, 2 weeks for completion.

Light is not expected to be a resource concern because the location will not be lit during well development or production.