

# DUST MITIGATION PLAN

**GMT** EXPLORATION COMPANY LLC

**Invicta 3-65 28 Pad**

Sec. 28 T3S R65W N/2

City of Aurora, Colorado

Surface: Fee

City of Aurora

Energy & Environment Division

DA-2371-01

Case Number 2023-6050-01

Submitted as an accompaniment to the Form 2A Application  
and consistent with the requirements of Rule 427.a.

August 31, 2023

Revised: August 21, 2024

Revised: September 23, 2024

**GMT Exploration Company LLC  
City of Aurora  
Adams County, Colorado**

**Dust Mitigation Plan**

**Project Summary:**

GMT Exploration Company LLC's (GMT's) proposed Invicta 3-65 28 Pad "Location" is located in Township 3 South, Range 65 West N/2 of Section 28 in Adams County, Colorado. The proposed project is located within the proposed Aurora Highlands Industrial Park. The sloped granular surfaced drill pad will support the proposed (8) eight wells. The proposed location is on fee surface with a total Location disturbance of 19.075 acres which includes the active working pad surface area of 8.585 acres. During interim reclamation and the production phase 8.774 acres will be reclaimed leaving a disturbed production area of 10.301 acres.

**Plan**

**Project Overview:**

GMT's Dust Mitigation Plan is intended to facilitate compliance with the applicable regulations of the Colorado Oil and Gas Conservation Commission, the Colorado Department of Public Health and Environment and City of Aurora, Adams County.

GMT's development of the Invicta 3-65 28 Location requires earth disturbing activities and travel on unpaved roads which has the potential to produce fugitive dust emissions.

Dust associated with the Location activities and traffic on roads will be minimized throughout all phases such that there are minimal visible dust emissions from the Location or associated roads to the maximum extent practicable given wind and other weather conditions. Please see below Plans for Suppressing Fugitive Dust caused by wind and GMT's Best Management Practices as listed below for Dust Mitigation. Sand, silica, or other materials used during the completion phase will be stored in covered containers. GMT will utilize Sandbox if available.

Any chemical application will have Safety Data Sheets on location and/or available electronically.

**Compliance with Rule 427.a.**

1. Wellpad and Access Road soil types:
  - Adena-Colby Association, Gently Sloping
  - Platner Loam, 3 to 5 percent slopes
  - Adena-Colby Association, Moderately Sloping
  - Adena Loam, 0 to 3 percent slopes

2. Proposed vehicle speed limit: 20 MPH or less on roads; 5 MPH or less on the Location.

3. Total disturbed area: 25.523 acres

- Wellpad: 19.075 acres
- Access Road: 3.202 acres
- Pipeline Corridor Disturbance: 3.246 acres

4. Please see enclosed Haul Route Map.

5.

Number of truck trips during the Construction, Drilling, Completion and Production stages:

Development State	Time Frame	Traffic Per Stage - Daily
Surface Construction	45 Days	44
Drilling per well	30 Days	50
Completion per well	40 Days	112
Flowback per well	14 - 21 Days	52
Production	20 Years	±1

6. Plan for Suppressing Fugitive Dust Caused by Wind:

- If wind conditions are such that work cannot be completed without creating fugitive dust, action will be immediately taken to apply water to all dust-creating surfaces.
- Regular road maintenance will be implemented to mitigate fugitive dust.
- Avoid unnecessary work on dust generating on high wind days (sustained winds 25 mph or greater).
- Natural or artificial windbreaks may be utilized as appropriate.
- Utilize gravel, and/or coconut blankets, silt fences, etc. in high wind areas on specific portions of roads and wellpads.

7. Best Management Practices:

- GMT will gravel all working surfaces and perform interim reclamation within six months of well drilling and completion.
- Utilize existing vegetation, trees slash or brush piles to cover disturbed areas not used for vehicle traffic.
- Application of fresh water during dry season and during dusty events.
- Operations will be confined to the wellpad working surface.
- Continuous monitoring of disturbed areas to evaluate additional BMPs needed.
- Fresh water application to disturbed areas during construction.

- Fresh water application to graveled surfaced of the Location and associated roads.
- Speed limit signs will be posted per surface owner agreement.
- Contractors will be notified of speed limits if no signs are posted. Proposed vehicle speed limit of 20 mph or less on lease roads; 5 mph or less on the location.
- Regular road maintenance such as grading and adding additional gravel as needed.
- Covered storage containers will be used for sand, silica, proppant or similar material during hydraulic fracturing for dust containment.