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# INVICTA 3-65-28

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## City of Aurora Oil and Gas Permit

Application Number: DA-2371-01

Case Number: 2023-6050-01

Section 28 T3S R65W

City of Aurora

Adams County, Colorado

## Letter of Introduction

Prepared for GMT Exploration Company LLC

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Phase II: June 18, 2024

Phase II Rev1: August 21, 2024

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## LETTER OF INTRODUCTION

Invicta 3-65-28 Phase II Submittal  
DA- 2371-01

Please add" located within the proposed Aurora Highlands Industrial Park. The sloped granular surfaced drill pad will support the proposed (8) eight wells.

### Project Summary and Purpose

GMT Exploration Company LLC's (GMT's) submits this application for an Oil and Gas location and Oil and Gas Permit (OGP) with the City of Aurora through the Oil and Gas Manual. The proposed oil and gas location, Invicta 3-65 28 Pad, "Location" is located in Township 3 South, Range 65 West of Section 28: N/2 in City of Aurora Adams County, Colorado. The proposed location is on fee surface (parcel 0181928100003) with a required total Location disturbance of 19.075 acres which includes the active working pad surface area of 8.585 acres. A new access road is required for this oil and gas location.

During interim reclamation and the production phase 8.774 acres will be reclaimed leaving a disturbed production area of 10.301 acres. The access road and Right-of-Way disturbance will be approximately 3.202 acres.

The Invicta 3-65 28 OGDGP was heard by the Colorado Energy & Carbon Management Commission on July 10, 2024. The ECMC Form 2A was approved on July 15, 2024. The Form 2's will be prepared for the drilling of each well at a later date.

The neighborhood meeting was held during the City's Phase I on February 13, 2024.

The Invicta 3-65 28 City of Aurora Permit was presented to the Aurora Planning and Zoning Commission on March 13, 2024. The Aurora Planning and Zoning Commission approved the Invicta 3-65 28 location.

There were no conditions for approval set forth in the Aurora Planning and Zoning Commission hearing.

### REMAINING APPLICABLE REGULATIONS FOR PHASE II:

#### Road Maintenance Agreement (RMA)

- The initial RMA was executed by GMT. An Alternative Haul Route was provided in the executed RMA as requested by PW Engineering.
- GMT will conduct a Baseline Study of both the primary and alternate haul routes. This Baseline Study will be provided after the final permit has been issued and prior to construction. This will be done to ensure the Baseline Study accurately reflects road conditions prior to GMT use.
- Pavement Widening: ~~GMT will not agree to the requested widening of the intersections.~~ The City of Aurora has already secured a commitment and a bond from another applicant (Civitas) to make the required road improvements. These road improvements are associated with the King and Bijou projects. Additionally, GMT has already agreed to a \$40,000/well impact fee.
- 38<sup>th</sup> Avenue: GMT has a Surface Use Agreement (SUA) which covers access to 38<sup>th</sup> Avenue. 38<sup>th</sup> Avenue is privately owned presently.

- Land Development Review: Clearly identify 38<sup>th</sup> Avenue at the access point and show if the culverts are in ROW. 38<sup>th</sup> Avenue is not owned by the City of Aurora and there is no timeline as to when 38<sup>th</sup> Avenue would be dedicated to the City of Aurora. Therefore, no license agreements are needed.

#### Aurora Water:

- GMT has initiated a revised Water Service Agreement with Barr Lake as the water source.
- Per discussions with Aurora Water, Water for Drilling and Completions will be sourced from Barr Lake State Park (13401 Picadilly Rd, Brighton, CO 80603). GMT is working with a 3<sup>rd</sup> party Vendor to manage the lay flat lines needed for GMT's water supply. The Vendor currently has numerous valid license agreements in place with the City of Aurora. GMT has presented a new Water Service Agreement and a new water source (Barr Lake) to the Aurora Water Department and expects this agreement to be approved at the next Water Board meeting on July 17, 2024. Once the Water Service Agreement, and associated water sources are approved by Aurora Water and the Water Board, GMT will confirm all license agreements are in place.
- GMT is waiting on response to the revised Water Service Agreement.

#### Request for Variance: Noise Management Plan

- ~~Please see Invicta 3-65-28 Noise Variance Request~~
- ~~GMT is seeking the Noise variance as there are no Residential Building Units within 5,280' of the location.~~
- The Location is not within any High Priority Habitats.
- The area is zoned Airport District (AD). Current land use is cropland/agricultural.
- GMT was granted a Lesser Impact Area Exemption for Noise from ECMC.



## LETTER OF INTRODUCTION

Invicta 3-65-28 Phase I Submittal  
DA- 2371-00

### Project Summary and Purpose

GMT Exploration Company LLC’s (GMT’s) submits this application for an Oil and Gas location and Oil and Gas Permit (OGP) with the City of Aurora through the Oil and Gas Manual. The proposed oil and gas location, Invicta 3-65 28 Pad, “Location” is located in Township 3 South, Range 65 West of Section 28: N/2 in Adams County, Colorado. The proposed location is on fee surface (parcel 0181928100003) with a required total Location disturbance of 19.075 acres which includes the active working pad surface area of 8.585 acres. A new access road is required for this oil and gas location.

During interim reclamation and the production phase 8.774 acres will be reclaimed leaving a disturbed production area of 10.301 acres. The access road and Right-of-Way disturbance will be approximately 3.202 acres.

The neighborhood meeting will be scheduled and held during the City’s Phase I. GMT will notify the city once a date has been selected. GMT will be seeking a variance for Noise Management Plan.

### Sequence of Major Activities and Estimated Completion Date

#### Preliminary Operational Schedule:

Location Name	Construction Phase	Drilling Phase	Completions Phase	Production Phase	Interim Reclamation	Final Reclamation
Invicta Pad	Q2-2024	Q3-2024	Q4-2024	Q1-2025	Q2-2025	Q1-2044

#### Access Road and Wellpad Construction:

##### Phase I - Pre-Drilling (45 days)

Includes both location and production pad construction.

Location construction is generally comprised of mobilizing/demobilizing various combinations of backhoes, dozers and/or graders to create a relatively flat surface that can accommodate equipment to drill, complete and produce wells. Just prior to grading, implements/designs to handle stormwater are installed on and around the location. Once stormwater measures are in place and the grade is set, the location is plated with road base to both stabilize and prevent erosion/dust. This phase of construction takes place prior to drilling start. Equipment will be delivered to the location via truck. A Haul Route Map has been included.

The needed area for construction will be cleared and the topsoil will be stripped. The topsoil and spoil piles are clearly labeled and separated to ensure preservation of the topsoil for final site reclamation.

A combination of wattles and a ditch will be implemented around the perimeter of the site in downsloping areas prior to earth disturbing activities taking place. The wattles will be the primary control measure installed until the pad is constructed and the associated ditch and basins can be completed.

Once the wellsite is constructed and in stable condition the wells will be drilled.

**Phase II – Drilling and Completion Activities (Drilling: 65 days, Completion: 80 days)**

Drilling operations will be 24 hours a day with crews working shifts. Includes mobilizing/demobilizing a drilling rig and all associated ancillary equipment to a location and then performing the operation of drilling/setting/cementing surface and production casing for a group of horizontal wellbores.

The portable toilets shall have hand washing facilities which will be readily accessible to employees and contractors and will ensure that employees and contractors wash their hands immediately or as soon as feasible after removal of gloves or other personal protective equipment pursuant to OSHA requirements under Occupational Exposure to Bloodborne Pathogens, 29 CFR 1910.1030, requires in sections (d)(2)(iii) and (v).

GMT will use a “closed loop system” during drilling. No pits will be on location. Drilling mud will be disposed of offsite, in a manner approved by the Colorado Energy and Carbon Management Commission (ECMC).

Water for Drilling and Completions will be sourced from the Lowry Ranch Pond located in Section 8, T5S, R64W and the Sky Ranch Pond in Section 10, T4S, R65W. As indicated in the Water Plan (attached to Permit), the water will be delivered by lay flat lines. A map has been included in the Water Plan.

After the drilling rig is moved out well completion activities will commence. Completion activities will take approximately the same time as the drilling of the well. Hydraulic fracturing materials consisting mainly of water and sand (99.5%) will be mixed onsite and pumped down the wells at high pressure to fracture the rock allowing the well to “flow”. Any additional operations including well stimulation will be done at this point.

**Phase III – Production**

The production facility construction is generally comprised of setting and connecting all equipment that will be process production from the wells. This phase of construction typically takes place in parallel with the drilling and completions phase of development.

Once the well is drilled and completed it will be put online. Phase III can last upwards of 40 years. There will be minimal vehicle traffic; one to two light trucks per day may travel the road to check wells and perform any necessary maintenance. Periodic downhole maintenance and repair will be done on an as needed basis. Please refer to the included Traffic Impact Analysis prepared by LSC Transportation Consultants, Inc. The included Traffic Impact Analysis contains the following: the existing roadway and traffic conditions in the vicinity of the site including the lane geometries, traffic controls, etc.; the existing weekday peak-hour traffic volumes; the existing daily traffic volumes in the area; the typical weekday site-generated traffic volume projections for the site; the assignment of the projected traffic volumes to the area roadways for the highest trip generating phases; the projected total traffic volumes on the area

roadways; the site's projected traffic impacts; and any recommended roadway improvements to mitigate the traffic impacts from the site. The estimated timing of each phase is the best information available today but is subject to change over time.

**Phase IV – Plugging and Restoration**

At the end of a well's life, ±20-40 years, and when production declines past the point of the well being economic, the well will be plugged. After all wells on the wellpad have been properly plugged, the wellpad will be restored to the pre-construction conditions. Backfilling, leveling and recontouring is performed as soon as possible, weather permitting, to return the wellpad back to its original state. The access road, along with other associated, unneeded facilities, will also be returned to their original states in accordance with all federal, state and local laws and per all surface use agreements with the private surface owners.