

February 12, 2021

Ms. Julie Murphy
Director
Colorado Oil and Gas Conservation Commission
1120 Lincoln, Ste 801
Denver, CO 80203

Re: Confidential Asset Transfer Attestation Impetro Resources LLC to Smith Energy LLC, Intent & Subsequent

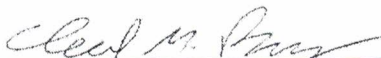
Dear Director Murphy:

In accordance with Rule 218.b.(1-7) Transfer of Operatorship Intent, Impetro Resources LLC (Impetro), Selling Operator, would like to inform Colorado Oil and Gas Conservation Commission (COGCC) that Impetro will be transferring select assets to Buying Operator Smith Energy LLC (Smith). The transaction is to be considered confidential and any other associated information confidential pursuant to § 24-72-204(3)(a)(IV), C.R.S. In lieu of a Form 9 Intent and Subsequent, Impetro and Smith submit this letter of attestation and associated documents to notify the COGCC of the transfer of assets.

Per Rule 218.a.(1) Included as Attachment A is Transferable Items associated with this transaction. Both Operators agree to the transfer of operatorship of the attached list of Transferable Items and that the attached list of Transferable Items is complete. Smith is working with COGCC to verify the additional financial assurance necessary, if any to cover the bonding per Rule 703. The transfer is anticipated to take place February 16, 2021. Smith will be assuming responsibility for all Transferrable Items associated in this transaction. Any Items not transferring in this transaction will remain the liability of Impetro and Impetro will retain compliance with Commission rules.

Selling Operator


Impetro Resources LLC
2820 Logan Dr.
Loveland, CO 80538
COGCC Operator # 10690



Samuel Bradley, Managing Member

Buying Operator

Smith Energy LLC
1540 Main St., Suite 218 #334
Windsor, CO 80550
COGCC Operator # 10536



Chris Smith, Vice President

Attachment A Transferable Items

CC: Trisha Fanning, Ardor Environmental LLC

ATTACHMENT A

Transferrable Items

Attachment A		
Items To Be Transferred		
Selling Operator:	Impetro Resources LLC	COGCC Operator # 10690
Buying Operator:	Smith Energy LLC	COGCC Operator # 10536
Asset Type	Asset Name	Location/Facility/API #
Well	JONES 6	05-121-09963
Well	JONES, J W 3	05-121-09962
Pit	JONES 6	117699
Pit	JONES J.W.	117696
Location	JONES, J W-63S51W /25NWNW	311874
Location	JONES-63S51W /26NWSE	317252

ATTACHMENT B

Non-Transferrable Items

Attachment B		
Related Items But Not Transferring		
Selling Operator:	Impetro Resources LLC	COGCC Operator # 10690
Buying Operator:	Smith Energy LLC	COGCC Operator # 10536
Asset Type	Asset Name	Location/Facility/API #
None		