

March 18, 2021

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

Re: Confidential Asset Transfer Attestation Smith Energy LLC to St. Croix Operating Inc., Intent & Subsequent

Dear Director Murphy:

In accordance with Rule 218.b.(1-7) Transfer of Operatorship Intent, Smith Energy LLC (Smith), Selling Operator, would like to inform Colorado Oil and Gas Conservation Commission (COGCC) that Smith will be transferring select assets to Buying Operator St. Croix Operating Inc. (St. Croix). 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 individual attestations for the Form 9 Intent and Subsequent, Smith and St. Croix 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. St. Croix has financial assurance in place to cover the bonding requirement to acquire these assets to their operatorship per Rule 703. The transfer is anticipated to take place March 22, 2021. St. Croix will be assuming responsibility for all Transferrable Items associated in this transaction. Any Items not transferring in this transaction will remain the liability of Smith, and Smith will retain compliance with Commission rules.

**Selling Operator**

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

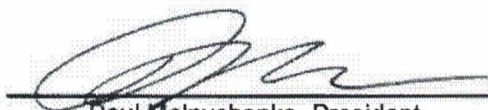


---

Chris Smith, Vice President

**Buying Operator**

St. Croix Operating Inc.  
P.O. Box 13799  
Denver, CO 80201  
Operator # 81490



---

Paul Melnychenko, President

Attachment A Transferable Items

CC: Trisha Fanning, Ardor Environmental LLC

**ATTACHMENT A**

**Transferrable Items**

## Items To Be Transferred

---

Selling Operator: Smith Energy LLC      COGCC Operator # 10536  
Buying Operator: St. Croix Operating Inc.      COGCC Operator # 81490

Asset Type	Asset Name	Location/Facility/API #
Location	Young #12-11350	474200
Off-Location Flowline	Production Line #12-11350	474203