

State of Colorado
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203 Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:

402649871

Receive Date:

12/15/2021

TRANSFER OF OPERATORSHIP

A Selling Operator will notify the Commission about the transfer of any Transferable Item associated with its Oil and Gas Operations to a Buying Operator by filing a Form 9, Transfer of Operatorship – Intent, with the Commission at least 30 days, or as soon as practicable, before the anticipated transfer date. (Rule 218.b.) When a transaction subject to a Form 9 – Intent becomes final, the Buying Operator will submit a Form 9 – Subsequent within 7 days of closing. (Rule 218.d.(1).)

Type of Form 9, Transfer of Operatorship: ☐ Intent ☒ Subsequent Intent # 402611188

OPERATOR INFORMATION

SELLING OPERATOR INFORMATION

OGCC Operator Number: 39560 Contact Name and Telephone:
Name of Operator: TOP OPERATING COMPANY Name: Paul Herring
Address: 3609 S WADSWORTH BLVD STE 340 Phone: (303) 727-9915
City: LAKEWOOD State: CO Zip: 80235 Email: paul.herring@topoperating.com

BUYING OPERATOR INFORMATION

OGCC Operator Number: 10583 Contact Name and Telephone:
Name of Operator: PETRO OPERATING COMPANY LLC Name: Roger Parker
Address: 9033 E EASTER PLACE SUITE 112 Phone: (720) 362-5995
City: CENTENNIAL State: CO Zip: 80112-2105 Email: rogerparker9@aol.com

TRANSFER INFO

Transfer Dates

Form 9 Intent - Anticipated Date of Transfer: 03/01/2021
Form 9 Subsequent - Effective Date of Transfer: 03/01/2021

Confidentiality

Transfer is Confidential: Yes

Financial Assurance

Form 9 Intent - Estimated amount of Financial Assurance the Buying Operator will submit prior to anticipated date of transfer: \$ 0
Form 9 Subsequent - The Buying Operator's Financial Assurance:

Surety ID	Bond Type	Amount
20150075	PLUGGING	60,000

SUBSEQUENT LIABILITY

Rule 218.d.(1).D.i.

"For Transferable Items listed in Rule 218.d.(1).B.i an acknowledgment that upon the effective date of transfer, that the Buying Operator assumes all responsibility for compliance with the Act, the Commission's Rules, and all terms and conditions of existing Permits and Commission orders for the Transferable Items."

In checking this box the Buying Operator's acknowledges the subsequent liability pursuant to Rule 218.d.(1).D.i. ☒

Rule 218.d.(1).D.ii.

"For Transferable Items listed in Rule 218.d.(1).B.ii or iii, an acknowledgment that the Buying Operator may be or may become responsible for compliance with the Act, the Commission's Rules, and all terms and conditions of existing Permits and Commission orders if the Buying Operator takes any action, or fails to take any action, that would cause such Transferable Item to be out of compliance with the Act, the Commission's Rules, and all terms and conditions of existing Permits and Commission orders."

In checking this box the Buying Operator's acknowledges the subsequent liability pursuant to Rule 218.d.(1).D.ii. ☒

Rule 218.d.(1).D.iii.

"For Transferable Items not listed in Rule 218.d.(1).B.i-iii but Related in the Commission's records, an acknowledgment that the Commission will presume that the Transferable Item was transferred, and that the Buying Operator is responsible for compliance with the Act, the Commission's Rules, and all terms and conditions of existing Permits and Commission orders for the Transferable Items."

In checking this box the Buying Operator's acknowledges the subsequent liability pursuant to Rule 218.d.(1).D.iii. ☒

SUBMITTAL

OPERATOR COMMENT AND SUBMITTAL

I hereby certify all statements made in this form are, to the best of my knowledge, true, correct, and complete.

Print Name: Jessica Donahue Email: jdonahue@ardorenvironmental.com

Signature: _____ Title: Compliance Specialist Date: 12/15/2021

Wells & Facilities Transferred Summary

1	Facility Type	API	Facility ID	Location ID	Facility Name	QtrQtr	Sec	Twp	Rng
	LOCATION	-	311313	311313	DI-TA (JOHN DITIRRO)-62N66W 30SEW	SEW	30	2N	66W
	<u>County</u>	<u>Min.Owner. Type</u>	<u>Current Operator Num</u>	<u>Current Operator Name</u>					
	WELD		39560	TOP OPERATING COMPANY					
2	Facility Type	API	Facility ID	Location ID	Facility Name	QtrQtr	Sec	Twp	Rng
	LOCATION	-	318141	318141	DITA (J.DITIRRO)-62N66W 30SWW	SWW	30	2N	66W
	<u>County</u>	<u>Min.Owner. Type</u>	<u>Current Operator Num</u>	<u>Current Operator Name</u>					
	WELD		39560	TOP OPERATING COMPANY					
3	Facility Type	API	Facility ID	Location ID	Facility Name	QtrQtr	Sec	Twp	Rng
	LOCATION	-	318924	318924	COUNTER-62N66W 30NWW	NWW	30	2N	66W
	<u>County</u>	<u>Min.Owner. Type</u>	<u>Current Operator Num</u>	<u>Current Operator Name</u>					
	WELD		39560	TOP OPERATING COMPANY					
4	Facility Type	API	Facility ID	Location ID	Facility Name	QtrQtr	Sec	Twp	Rng
	OFF-LOCATION FLOWLINE	-	476988	311313	WELLHEAD LINE 30SEW	SEW	30	2N	66W
	<u>County</u>	<u>Min.Owner. Type</u>	<u>Current Operator Num</u>	<u>Current Operator Name</u>					
	WELD		39560	TOP OPERATING COMPANY					
5	Facility Type	API	Facility ID	Location ID	Facility Name	QtrQtr	Sec	Twp	Rng
	OFF-LOCATION FLOWLINE	-	476989	318141	WELLHEAD LINE 30SWW	SWW	30	2N	66W
	<u>County</u>	<u>Min.Owner. Type</u>	<u>Current Operator Num</u>	<u>Current Operator Name</u>					
	WELD		39560	TOP OPERATING COMPANY					
6	Facility Type	API	Facility ID	Location ID	Facility Name	QtrQtr	Sec	Twp	Rng
	PIT	-	103175	318924		NWW	30	2N	66W
	<u>County</u>	<u>Min.Owner. Type</u>	<u>Current Operator Num</u>	<u>Current Operator Name</u>					
	WELD		39560	TOP OPERATING COMPANY					
7	Facility Type	API	Facility ID	Location ID	Facility Name	QtrQtr	Sec	Twp	Rng
	PIT	-	103176	318141		SWW	30	2N	66W
	<u>County</u>	<u>Min.Owner. Type</u>	<u>Current Operator Num</u>	<u>Current Operator Name</u>					
	WELD		39560	TOP OPERATING COMPANY					
8	Facility Type	API	Facility ID	Location ID	Facility Name	QtrQtr	Sec	Twp	Rng
	TANK BATTERY	-	470203	318924		NWW	30	2N	66W
	<u>County</u>	<u>Min.Owner. Type</u>	<u>Current Operator Num</u>	<u>Current Operator Name</u>					
	WELD		39560	TOP OPERATING COMPANY					
9	Facility Type	API	Facility ID	Location ID	Facility Name	QtrQtr	Sec	Twp	Rng
	WELL	123-08487	240699	318141	DITA (J.DITIRRO) 1	SWW	30	2N	66W

	<u>County</u>	<u>Min.Owner. Type</u>	<u>Current Operator Num</u>	<u>Current Operator Name</u>					
	WELD	FEE	39560	TOP OPERATING COMPANY					
10	<u>Facility Type</u>	<u>API</u>	<u>Facility ID</u>	<u>Location ID</u>	<u>Facility Name</u>	<u>QtrQtr</u>	<u>Sec</u>	<u>Twp</u>	<u>Rng</u>
	WELL	123-09092	241303	311313	DI-TA (JOHN DITIRRO) 2	SENW	30	2N	66W
	<u>County</u>	<u>Min.Owner. Type</u>	<u>Current Operator Num</u>	<u>Current Operator Name</u>					
	WELD	FEE	39560	TOP OPERATING COMPANY					
11	<u>Facility Type</u>	<u>API</u>	<u>Facility ID</u>	<u>Location ID</u>	<u>Facility Name</u>	<u>QtrQtr</u>	<u>Sec</u>	<u>Twp</u>	<u>Rng</u>
	WELL	123-10282	242491	318924	COUNTER 1-AD	NWNW	30	2N	66W
	<u>County</u>	<u>Min.Owner. Type</u>	<u>Current Operator Num</u>	<u>Current Operator Name</u>					
	WELD	FEE	39560	TOP OPERATING COMPANY					
12	<u>Facility Type</u>	<u>API</u>	<u>Facility ID</u>	<u>Location ID</u>	<u>Facility Name</u>	<u>QtrQtr</u>	<u>Sec</u>	<u>Twp</u>	<u>Rng</u>
	WELL	123-24023	285801	311313	DI TA 1-A	SENW	30	2N	66W
	<u>County</u>	<u>Min.Owner. Type</u>	<u>Current Operator Num</u>	<u>Current Operator Name</u>					
	WELD	FEE	39560	TOP OPERATING COMPANY					

Incidents Transferred Summary

< No row provided >

Related Wells & Facilities Not Transferred Summary

< No row provided >

Related Incidents Not Transferred Summary

1	<u>Document Numbers</u>	<u>Incident Type</u>	<u>Incident Date</u>	<u>Current Op #</u>	<u>Current Op. Name</u>	<u>Compl. Resp. Op #</u>	<u>Compl. Resp. Op. Name</u>
	673800769	UNRESOLVED FIELD INSPECTION	04/21/2014	39560	39560		
2	<u>Document Numbers</u>	<u>Incident Type</u>	<u>Incident Date</u>	<u>Current Op #</u>	<u>Current Op. Name</u>	<u>Compl. Resp. Op #</u>	<u>Compl. Resp. Op. Name</u>
	685502493	UNRESOLVED FIELD INSPECTION	04/19/2017	39560	39560		
3	<u>Document Numbers</u>	<u>Incident Type</u>	<u>Incident Date</u>	<u>Current Op #</u>	<u>Current Op. Name</u>	<u>Compl. Resp. Op #</u>	<u>Compl. Resp. Op. Name</u>
	685502496	UNRESOLVED FIELD INSPECTION	04/19/2017	39560	39560		
4	<u>Document Numbers</u>	<u>Incident Type</u>	<u>Incident Date</u>	<u>Current Op #</u>	<u>Current Op. Name</u>	<u>Compl. Resp. Op #</u>	<u>Compl. Resp. Op. Name</u>
	685503361	UNRESOLVED FIELD INSPECTION	07/20/2017	39560	39560		
5	<u>Document Numbers</u>	<u>Incident Type</u>	<u>Incident Date</u>	<u>Current Op #</u>	<u>Current Op. Name</u>	<u>Compl. Resp. Op #</u>	<u>Compl. Resp. Op. Name</u>
	685503364	UNRESOLVED FIELD INSPECTION	07/20/2017	39560	39560		
6	<u>Document Numbers</u>	<u>Incident Type</u>	<u>Incident Date</u>	<u>Current Op #</u>	<u>Current Op. Name</u>	<u>Compl. Resp. Op #</u>	<u>Compl. Resp. Op. Name</u>
	699301831	UNRESOLVED FIELD INSPECTION	05/20/2020	39560	39560		

Wells & Facilities Proposed Not Transferred Summary

< No row provided >

Incidents Proposed Not Transferred Summary

< No row provided >

Attachment List

<u>Att Doc Num</u>	<u>Name</u>
402649871	Form 09 SUBMITTED
402649992	FORM 9 SUBSEQUENT ATTESTATION
402650226	EDD-S-WELLS-FACILITIES-TRANSFERRED
402650304	BUYER NOTIFIED LOCAL GOVT ATTESTATION
402899888	EDD-S-RELATED-INCIDENTS-NOT-TRAN
402899897	SELLER RETAINS RESPONSIBILITY ATTESTATION

Total Attach: 6 Files

Condition of Approval

COA Type

Description

0 COA	

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Financial Assurance	6 FIRs were added to list of related incidents not transferred, and seller provided attestation of compliance responsibility. Forms approved.	12/15/2021
Financial Assurance	Subsequent was missing 6 related unresolved field inspection reports. Returned to draft and contacted operators 12/1. Operators need to account for FIRs as transferrable items per Rule 218(a)(1)(H).	12/01/2021
Prod/Levy	Subsequent review is complete. Forwarded to financial assurance.	07/28/2021
Total: 3 comment(s)		