

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:

402633327

Receive Date:

12/21/2021

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 # 402611815**OPERATOR INFORMATION****SELLING OPERATOR INFORMATION**

OGCC Operator Number: 10690

Contact Name and Telephone:

Name of Operator: IMPETRO RESOURCES LLC

Name: Sam Bradley

Address: 2820 LOGAN DRIVE

Phone: (970) 5938626

City: LOVELAND State: CO Zip: 80538

Email: sbradley.impetro@gmail.com

BUYING OPERATOR INFORMATION

OGCC Operator Number: 10536

Contact Name and Telephone:

Name of Operator: SMITH ENERGY LLC

Name: Chris Smith

Address: 1540 MAIN ST SUITE 218 #334

Phone: (303) 7096157

City: WINDSOR State: CO Zip: 80550

Email: smithenergy@live.com

TRANSFER INFO**Transfer Dates**

Form 9 Intent - Anticipated Date of Transfer: 02/16/2021

Form 9 Subsequent - Effective Date of Transfer: 03/04/2021

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
20140099	PLUGGING	100,000

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: Chris Smith Email: smithenergy@live.com

Signature: _____ Title: Manager Date: 12/21/2021

Wells & Facilities Transferred Summary

1	<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>
	LOCATION	-	311874	311874	JONES, J W-63S51W 25NWNW	NWNW	25	3S	51W
	<u>County</u>	<u>Min.Owner. Type</u>	<u>Current Operator Num</u>	<u>Current Operator Name</u>					
	WASHINGTON		10690	IMPETRO RESOURCES LLC					
2	<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	121-09962	237460	311874	JONES, J W 3	NWNW	25	3S	51W
	<u>County</u>	<u>Min.Owner. Type</u>	<u>Current Operator Num</u>	<u>Current Operator Name</u>					
	WASHINGTON	FEE	10690	IMPETRO RESOURCES LLC					
3	<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>
	LOCATION	-	317252	317252	JONES-63S51W 26NWSE	NWSE	26	3S	51W
	<u>County</u>	<u>Min.Owner. Type</u>	<u>Current Operator Num</u>	<u>Current Operator Name</u>					
	WASHINGTON		10690	IMPETRO RESOURCES LLC					
4	<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>
	PIT	-	117699	317252		NWSE	26	3S	51W
	<u>County</u>	<u>Min.Owner. Type</u>	<u>Current Operator Num</u>	<u>Current Operator Name</u>					
	WASHINGTON		10690	IMPETRO RESOURCES LLC					
5	<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	121-09963	237461	317252	JONES 6	NWSE	26	3S	51W
	<u>County</u>	<u>Min.Owner. Type</u>	<u>Current Operator Num</u>	<u>Current Operator Name</u>					
	WASHINGTON	FEE	10690	IMPETRO RESOURCES LLC					
6	<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>
	PIT	-	117696	311868		NWNW	25	3S	51W
	<u>County</u>	<u>Min.Owner. Type</u>	<u>Current Operator Num</u>	<u>Current Operator Name</u>					
	WASHINGTON		10690	IMPETRO RESOURCES LLC					

Incidents Transferred Summary

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Related Wells & Facilities Not Transferred Summary

1	<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>
	LOCATION	-	311868	311868	JONES J W-63S51W 25NWNW	NWNW	25	3S	51W
	<u>County</u>	<u>Min.Owner. Type</u>	<u>Current Operator Num</u>	<u>Current Operator Name</u>	<u>Compl Resp. Op. #</u>	<u>Compl. Resp. Op. Name</u>			
	WASHINGTON		10690c	IMPETRO RESOURCES LLC	10690	IMPETRO RESOURCES LLC			
2	<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	121-05435	233397	311868	JONES J W 1	NWNW	25	3S	51W
	<u>County</u>	<u>Min.Owner. Type</u>	<u>Current Operator Num</u>	<u>Current Operator Name</u>	<u>Compl Resp. Op. #</u>	<u>Compl. Resp. Op. Name</u>			
	WASHINGTON	FEE	10690c	IMPETRO RESOURCES LLC	10690	IMPETRO RESOURCES LLC			

Related Incidents Not Transferred Summary

< No row provided >

Wells & Facilities Proposed Not Transferred Summary

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Incidents Proposed Not Transferred Summary

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Attachment List

<u>Att Doc Num</u>	<u>Name</u>
402633327	Form 09 SUBMITTED
402899845	EDD-S-RELATED-WELLS-FACILITIES-NOT-TRAN
402899849	BUYER NOTIFIED LOCAL GOVT ATTESTATION
402899855	EDD-S-WELLS-FACILITIES-TRANSFERRED
402905783	FORM 9 SUBSEQUENT ATTESTATION
402905830	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	Both operators have resolved all issues. Form 9 Approved.	01/14/2022
Permit	With consent of Buying Operator Smith O & G, staff removed these attachments: 402633378 (FORM 9 SUBSEQUENT ATTESTATION); 402633346 (EDD-S-WELLS-FACILITIES-TRANSFERRED); 402633354 (EDD-S-WELLS-FACILITIES-TRANSFERRED); 402633356 (EDD-S-RELATED-WELLS-FACILITIES-NOT-TRAN); 402633363 (EDD-S-RELATED-WELLS-FACILITIES-NOT-TRAN), 402633364 (EDD-S-WELLS-FACILITIES-PROP-NOT-TRAN) and cleared this data: Wells & Facilities Transferred and Wells & Facilities Proposed Not Transferred. Form Returned to Draft for Corrections	12/01/2021
Permit	Problems Identified: 1 - The document labeled "Form 9 Subsequent Attestation" attached to the Form 9 - Subsequent is actually the "Buyer Notified Local Govt Attestation." 2 - The "Buyer Notified Local Govt Attestation" attached to the Form 9S only lists the 2 Wells being transferred. It should also list the 2 Locations and the 2 Pits. In addition, though it was signed by the Buying Operator, it was written by and sent to the local government by the Selling Operator. 3 - The "Wells & Facilities Transferred" list (Doc # 402633354) has Smith Energy as the Current Operator. This is incorrect; it should be Impetro and Op # 10690. 4 - There is a second "Wells & Facilities Transferred" list (Doc # 402633346) which is actually the "Related Wells & Facilities Not Transferred" list. 5 - There are two "Wells & Facilities Not Transferred" lists (Doc # 402633363 & Doc # 402633356). Neither of them were successfully uploaded to populate the form; the "View" button shows no records to display. 6 - There is a "Wells & Facilities Proposed Not Transferred" list (Doc # 402633364). This list is not necessary for this transfer.	12/01/2021
Permit	Reviewed Form 9I (402611815) and Form 9S (402633327). The Form 9S has 6 errors that will require clearing data and removing attachments and then returning the form to draft. Emailed Selling & Buying operators: described errors & solutions & requested consent to clear data and remove attachments before returning to draft.	11/28/2021
Total: 4 comment(s)		