

From: [Deborah Bracey - DNR](#)
To: [Jeff Kirtland](#)
Cc: [Jarrett Ellis - DNR](#)
Subject: RE: FW: URSA Operating Company LLC - Operator 10447
Date: Monday, February 28, 2022 4:05:14 PM
Attachments: [image003.png](#)

Jeff,

The answer to your questions are as follows.

1. Yes, we need both the intent and the subsequent submitted. The subsequent is what actually transfers the assets in our database, and the system will not allow a subsequent to be created without an intent to reference.
2. As you are an agent for both entities, it's acceptable for you to sign for parties and submit for both.
3. Please list the following bonds on the Form 9.
 - a. 2016-0057 Plugging \$100,000.00
 - b. 2016-0061 Gas Facility \$50,000.00
 - c. 2018-0062 Produced Water Transfer \$50,000.00
 - d. 2016-0060 Plugging – Excess Inactive \$500,000.00
4. When completing the attestations, just create signature blocks for both entities and sign for both.

Please reach out if you have any more questions.

Thanks,
Deb

Deborah Bracey
Accountant



P 303.894.2100 X5134 | F 303.894.2109
1120 Lincoln Street, Suite 801, Denver, CO 80203
deborah.bracey@state.co.us | www.colorado.gov/cogcc

From: Ellis - DNR, Jarrett <jarrett.ellis@state.co.us>
Sent: Friday, February 25, 2022 3:45 PM
To: Deborah Bracey - DNR <deborah.bracey@state.co.us>
Subject: Re: FW: URSA Operating Company LLC - Operator 10447

Hi Deb,

The answers to his questions are as follows.

1. Yes, we need both the intent and the subsequent submitted. The subsequent is what actually transfers the assets in our database, and the system will not allow a subsequent to be

created without an intent to reference.

2. As long as Jeff is the agent for both entities, it's acceptable for him to sign for both parties and submit for both.

3. List the following bonds on the Form 9:

2016-0057	ACTIVE	PLUGGING	\$100,000.00	BLANKET	5/4/2016	INSURANCE	B009983
2016-0058	ACTIVE	SURFACE	\$25,000.00	BLANKET	5/4/2016	INSURANCE	B009974
2016-0059	ACTIVE	SEISMIC	\$25,000.00	BLANKET	5/4/2016	INSURANCE	B009951
2016-0060	ACTIVE	PLUGGING	\$500,000.00	EXCESS INACTIVE	5/4/2016	INSURANCE	B009956
2016-0061	ACTIVE	GAS FACILITY	\$50,000.00	BLANKET	5/4/2016	INSURANCE	B009971
2016-0062	ACTIVE	WASTE MGMT FACILITY	\$1,998,183.21	INDIVIDUAL	5/4/2016	INSURANCE	B009975
2016-0063	ACTIVE	WASTE MGMT FACILITY	\$1,209,678.00	INDIVIDUAL	5/4/2016	INSURANCE	B009967
2016-0064	ACTIVE	WASTE MGMT FACILITY	\$1,000,000.00	INDIVIDUAL	5/4/2016	INSURANCE	B009968
2016-0065	ACTIVE	WASTE MGMT FACILITY	\$653,000.00	INDIVIDUAL	5/4/2016	INSURANCE	B009970
2016-0066	ACTIVE	WASTE MGMT FACILITY	\$2,418,974.08	INDIVIDUAL	5/31/2016	INSURANCE	B009972
2016-0067	ACTIVE	WASTE MGMT FACILITY	\$50,000.00	INDIVIDUAL	5/31/2016	INSURANCE	B009954
2016-0069	ACTIVE	WASTE MGMT FACILITY	\$1,264,800.00	INDIVIDUAL	7/7/2016	INSURANCE	B010072
2016-0128	ACTIVE	WASTE MGMT FACILITY	\$880,000.00	INDIVIDUAL	11/16/2016	INSURANCE	B010266
2017-0084	ACTIVE	WASTE MGMT FACILITY	\$585,000.00	INDIVIDUAL	7/28/2017	INSURANCE	B010899
2018-0001	ACTIVE	PLUGGING	\$5,000.00	INDIVIDUAL	1/4/2018	INSURANCE	B011154
2018-0012	ACTIVE	WASTE MGMT FACILITY	\$600,000.00	INDIVIDUAL	1/24/2018	INSURANCE	B011208
2018-0054	ACTIVE	WASTE MGMT FACILITY	\$801,000.00	INDIVIDUAL	4/26/2018	INSURANCE	B011382
2018-0062	ACTIVE	PRODUCED WATER TRANSFER	\$50,000.00	BLANKET	5/16/2018	INSURANCE	B011395
2018-0165	ACTIVE	PLUGGING	\$50,000.00	INDIVIDUAL	8/7/2018	INSURANCE	B011513

(Verify none of the wells on Teri's list are inactive.)

4. Include signature blocks for both companies and Jeff can sign for each.

Jarrett Ellis
Finance Manager

Cell 720.591.0356
1120 Lincoln St., Suite 801, Denver, CO 80203
jarrett.ellis@state.co.us | cogcc.state.co.us

On Fri, Feb 25, 2022 at 2:43 PM Deborah Bracey - DNR <deborah.bracey@state.co.us> wrote:

Jarrett,

I would like to put some time on your schedule for Monday to discuss the answers to Jeff Kirtland's email below. I am thinking that he will ultimately need submit both the intent and the subsequent with only TEP signing? It appears the bonding has been transferred from URSA to TEP, but would need Debbie to confirm. I think that the attestations would just be signed by TEP. We would still need a Buyer Notified Govt attestation.

Deb

Deborah Bracey
Accountant



P 303.894.2100 X5134 | F 303.894.2109
1120 Lincoln Street, Suite 801, Denver, CO 80203
deborah.bracey@state.co.us | www.colorado.gov/cogcc

From: Jeff Kirtland <JKirtland@terraep.com>
Sent: Friday, February 25, 2022 11:39 AM
To: Ikenouye - DNR, Teri <teri.ikenouye@state.co.us>; Bracey - DNR, Deborah <deborah.bracey@state.co.us>
Subject: RE: URSA Operating Company LLC - Operator 10447

Teri, thank you for the email.

Deb, I'm hoping you can help answer several questions I have regarding the submittal of the Form 9, as requested by Teri.

1. Since there is no one around from URSA and the transaction was completed in December 2020, are both a Form 9 Intent and a Form 9 Subsequent required or just the Intent?
2. If both forms are required, who should submit the Intent? There is no one from URSA who can submit the form. Since I was made the DA for the 10447 operator number following the acquisition in 2020, I would be the only person submitting both Form 9s.
3. What specific information is required for the Financial Assurance section? When TEP acquired URSA we worked closely with Debbie Lutz and provided the same level of FA through Bond Riders and what is covered under the current TEP blanket bonds. Will it suffice if I list the blanket bonds for plugging, produced water transfer systems, and gas facilities of \$200,000 that TEP has in place?
4. Given there is no one from URSA around anymore, how should the Attestation be submitted? Again, I would be submitting both forms using my name as the selling and purchasing operator. The Form 9 requires an attachment of Attestation, which will be signed by me only as selling and purchasing operator. Is this acceptable?

Thank you,

Jeff Kirtland
Regulatory Manager
TEP Rocky Mountain LLC
(Terra Energy Partners LLC)

From: Ikenouye - DNR, Teri <teri.ikenouye@state.co.us>

Sent: Tuesday, February 22, 2022 10:41 AM
To: Jeff Kirtland <JKirtland@terraep.com>; Bracey - DNR, Deborah <deborah.bracey@state.co.us>
Subject: Re: URSA Operating Company LLC - Operator 10447

Good Morning Jeff-

I hope you had a nice weekend! I took a few days off, but back at the keyboard and ready to go today. I was able to finish the last Form 10 (document 402554498) last week, and I have attached an updated list of what is still showing under Ursa's operator number. There are 8 wells/UIC Disposals, a few AC status locations and the produced water transfer system will all need to be submitted on a Form 9 to transfer to TEP. The spills are all CL status, so those can stay under the Ursa operator number. The gas compressor stations will need to go onto a Form 12 to transfer. Deb Bracey is your contact for questions on the Form 9, and help on the Form 12 is Ellice Whittington - she is your expert on that.

Thank you again for your patience!
Take care,
Teri

On Mon, Feb 14, 2022 at 6:46 AM Jeff Kirtland <JKirtland@terraep.com> wrote:

Good morning Teri, and Happy Monday. I hope you had a nice weekend.

I was just following up on the final Form 10 (Doc# 4025544498) for URSA to TEP locations. Is there anything you need from me to help identify related locations, facilities, etc.? I did attached the search list that comes up in COGIS for reference.

Also, since the Grizzly Form 9s were the first attempt at completing the new form, please let me know if you need anything. I have received communication from the Grizzly folks asking me to help ensure the Form 9s are approved so they can get their bonds released.

I appreciate any information you can provide.

Thank you,

Jeff Kirtland
Regulatory Manager
TEP Rocky Mountain LLC
(Terra Energy Partners LLC)

From: Ikenouye - DNR, Teri <teri.ikenouye@state.co.us>
Sent: Friday, February 4, 2022 8:55 AM
To: Jeff Kirtland <JKirtland@terraep.com>
Subject: Re: URSA Operating Company LLC - Operator 10447

Morning Jeff-

Yes, I know I suck at taking days off. I have a 9:15am meeting that I need to be at so I am working until then. Just so you know, I will probably be asked to tackle

the Grizzly to TEP Form 9's next and I am on board to help.

Take care,
Teri

On Thu, Feb 3, 2022 at 3:29 PM Jeff Kirtland <JKirtland@terraep.com> wrote:

Thank you Teri!

Have a great weekend and stay warm!

Jeff Kirtland
Terra Energy Partners LLC
TEP Rocky Mountain LLC

On Feb 3, 2022, at 4:10 PM, Ikenouye - DNR, Teri
<teri.ikenouye@state.co.us> wrote:

Hi Jeff-

I have completed all of the approvals except for document 402554498. It is for locations only, and I need to review it again to see if any of the locations transferred with associated wells. (If I transfer something twice with the same effective date it makes our software twitch.) I am out of the office tomorrow on my regularly scheduled flex day, so I will work on the last Form 10 Monday morning.

Thanks!

Teri

On Wed, Feb 2, 2022 at 9:07 AM Jeff Kirtland <JKirtland@terraep.com> wrote:

Teri,

Thank you for the update, and please let me know if you need anything as you finalize your review/approval of the Form 10s.

I appreciate all the work you and your team are doing to keep up with the evolving transfer process.

Have a great day!

Jeff Kirtland
Regulatory Manager
TEP Rocky Mountain LLC
(Terra Energy Partners LLC)

From: Ikenouye - DNR, Teri <teri.ikenouye@state.co.us>
Sent: Wednesday, February 2, 2022 10:04 AM
To: Jeff Kirtland <JKirtland@terraep.com>
Subject: Re: URSA Operating Company LLC - Operator 10447

Hi Jeff-

I am not sure if the Form 9 will be necessary now. Our finance manager has given me the "green light" to do the approvals on the 11 Form 10's that are in process from Ursa to TEP. I will begin working on those approvals tomorrow. Once I am done processing all of them we can huddle up and see if there are any remaining assets under Ursa.

Thanks for your patience, and take care!
Teri

On Wed, Feb 2, 2022 at 6:49 AM Jeff Kirtland
<JKirtland@terraep.com> wrote:

Good morning Teri, I hope your week is going well.

I'm just following up on the email exchange below hoping to get some clarification about what we need to submit for the approval of the transfer that Ursa initiated in December 2019. I'm not clear on what additional entries would need to be uploaded into a Form 9, per your request below. Is it possible to jump on the phone to discuss? I can be reached at 970-312-5643.

Thank you for your help.

Jeff Kirtland
Regulatory Manager
TEP Rocky Mountain LLC
(Terra Energy Partners LLC)

From: Jeff Kirtland
Sent: Wednesday, January 26, 2022 3:06 PM
To: Ikenouye - DNR, Teri <teri.ikenouye@state.co.us>
Subject: RE: URSA Operating Company LLC - Operator 10447

Teri,

Thank you for your email response. With respect to your question, I was never told that a Form 9 would be required, all I received was an email with a report of items (see attached) with an ask to ensure these are items we are comfortable with including in the transfer. This transfer and submittal of the Form 10s by URSA occurred prior to the effective date of the rulemaking and the existence of the Form 9.

However, how would the Form 9 process be accomplished since the selling operator is no longer around? There are no longer agents from Urso that can meet the requirements of attesting to the transfers.

I'm interested in ensuring this transfer is completed, but need some clear guidance on what I need to do. Would you accept a subsequent Form 9 with the attached list of items? TEP has taken the responsibility of these items as we have been the operator since the transfer.

I appreciate any assistance and guidance you can provide.

Thank you,

Jeff Kirtland

Regulatory Manager
TEP Rocky Mountain LLC
(Terra Energy Partners LLC)

From: Ikenouye - DNR, Teri <teri.ikenouye@state.co.us>
Sent: Wednesday, January 26, 2022 2:53 PM
To: Jeff Kirtland <JKirtland@terraep.com>
Subject: Re: URSA Operating Company LLC - Operator 10447

Hi Jeff-

I have an email from our finance manager Jarrett Ellis dated 12/03/2021 that stated TEP was going to upload a Form 9 for some additional entities in order to complete what was related/missing from the other previously submitted Form 10's and then he would be the approver of the documents. That is where it left off on my desk!

Was an additional Form 9 submitted?

Thanks,
Teri

On Thu, Jan 13, 2022 at 9:01 AM Jeff Kirtland
<JKirtland@terraep.com> wrote:

Good morning Teri,

Happy Thursday, I hope you are doing well today. I wanted to follow up on the email sent last month regarding the Form 10s that have been in process, are you needing additional information to approve the Forms?

Thank you,

Jeff Kirtland

Regulatory Manager
TEP Rocky Mountain LLC
(Terra Energy Partners LLC)

From: Jeff Kirtland
Sent: Tuesday, December 14, 2021 12:50 PM
To: Ikenouye - DNR, Teri <teri.ikenouye@state.co.us>
Cc: Lutz - DNR, Deborah <debbie.lutz@state.co.us>
Subject: FW: URSA Operating Company LLC - Operator 10447

Teri,

We have reviewed the items in the list Debbie sent on 12/3 and have begun addressing them. For the purposes of the Form 10 approval, can you assign these items to us without an additional form submittal?

You can reach me at 970-312-5643.

Thank you,

Jeff Kirtland
Regulatory Manager
TEP Rocky Mountain LLC
(Terra Energy Partners LLC)

From: Lutz - DNR, Deborah <debbie.lutz@state.co.us>
Sent: Friday, December 3, 2021 1:13 PM
To: Jeff Kirtland <JKirtland@terraep.com>
Subject: URSA Operating Company LLC - Operator 10447

Hi Jeff,

Please see the attached report. Please note there are three tabs for review.

Thank you,

Debbie

Deborah Lutz
Financial Assurance Supervisor

P 303.894.2100 ext 5185 | F 303.894.2109
1120 Lincoln Street, Suite 801, Denver, CO 80203
debbie.lutz@state.co.us | www.colorado.gov/cogcc