

From: [Ali Bandy](#)
To: sherry@apiwf.com; "Deborah Bracey - DNR"
Cc: [Nic McClymond](#)
Subject: RE: [External] Form 9 Transfer - Armour Petroleum Inc #403260445 to Petroleum Exploration Company Ltd dba PETEX
Date: Monday, April 24, 2023 10:21:51 AM

Deb,

Petroleum Exploration Company, Ltd., dba PETEX accepts the COA set out below that within 10 days of Form 9 approval, Armor will file Form 3.

Thank you,

From: sherry@apiwf.com <sherry@apiwf.com>
Sent: Monday, April 24, 2023 11:18 AM
To: 'Deborah Bracey - DNR' <deborah.bracey@state.co.us>; Ali Bandy <abandy@petexltd.com>
Cc: Nic McClymond <nicmc@petexltd.com>
Subject: RE: [External] Form 9 Transfer - Armour Petroleum Inc #403260445 to Petroleum Exploration Company Ltd dba PETEX

Deb,

Armor Petroleum, Inc. accepts the COA set out below that within 10 days of Form 9 approval, Armor will file Form 3.

Sherry L. Fitts, PE

Armor Petroleum, Inc.

PO Box 4625
Wichita Falls, TX 76308
940-692-5001 ext 20
940-692-6081 fax

[**sherry@apiwf.com**](mailto:sherry@apiwf.com)

From: Deborah Bracey - DNR <deborah.bracey@state.co.us>
Sent: Monday, April 24, 2023 11:13 AM
To: Ali Bandy <abandy@petexltd.com>; sherry@apiwf.com
Cc: Nicmc@petexltd.com
Subject: RE: [External] Form 9 Transfer - Armour Petroleum Inc #403260445 to Petroleum Exploration Company Ltd dba PETEX

Good morning Ali,

The Subsequent Attestation needs to have the signatures of both operators. Please resubmit the Subsequent Attestation with the signatures of both operators. Also, both operators will need to accept the COAs listed in my first email. Furthermore when filing a revised Form 3, please use the following comment to reference a previously filed Form 3.

This Form 3 Document #____ is submitted as a result of an approved Form 9 Transfer of Operatorship and it replaces Form 3 document # ____.

Thanks,
Deb

From: Ali Bandy <abandy@petexltd.com>
Sent: Monday, April 24, 2023 8:37 AM
To: Deborah Bracey - DNR <deborah.bracey@state.co.us>
Cc: sherry@apiwf.com
Subject: RE: [External] Form 9 Transfer - Armour Petroleum Inc #403260445 to Petroleum Exploration Company Ltd dba PETEX

Good morning Deb,
Please see attached Subsequent Attestation and Subsequent Wells and Facilities transferred. Sherry provided the resolved NOAV. Let me know if there is anything else you need.
Thank you!

From: Deborah Bracey - DNR <deborah.bracey@state.co.us>
Sent: Friday, April 21, 2023 6:35 PM
To: sherry@apiwf.com; Ali Bandy <abandy@petexltd.com>
Cc: Nic McClymond <nicmc@petexltd.com>
Subject: [External] Form 9 Transfer - Armour Petroleum Inc #403260445 to Petroleum Exploration Company Ltd dba PETEX

Sherry and Ali,

I have reviewed the above captioned Form 9 transfer and noted the following issues.

Issue 1: Both operators need to sign both the Intent Attestation and Subsequent Attestation. The individuals signing the Attestations need to be an officer or Principal Agent.

Solution 1: If both operators sign the Subsequent Attestation, we can move forward with the transfer. Please have Nicholas McClymond sign on behalf of PETEX.

Issue 2: Regarding the Wells and Facilities Transferred since the Form 9 has not been approved, the Current Operator should reflect Armour Petroleum Inc.

Solution 2: Please resubmit the Wells and Facilities Transferred with the correct operator.

Issue 3: There is one incident, an Inspection with Corrective Action that is related and unaccounted for.

Solution 3: The corrective action may or may not have been resolved. FIRs with outstanding corrective actions are transferable items that must be accounted for in the Form 9 in one or more of the following ways.

1. If the compliance responsibility for such an FIR transfers to the buyer include that FIR on a Related Incidents Transferred list.

2. If the compliance responsibility for such an FIR is retained by the seller include that FIR on a Related Incidents Not Transferred list and provide a Seller Retains Responsibility Attestation. If the parties perform the research and determine that all corrective actions for a particular FIR have been resolved, that FIR does not need to be listed on the Form 9 but will be subject to Rule 218.d(1)D.iii.

All revised documents can be emailed to me. I will get them uploaded to the form.

Assuming the other Form 9 requirements are met, all Form 9s shall now be passed with the following two COAs:

The Buying Operator must file a *Form 3, Financial Assurance Plan*, within 10 business days of Form 9 approval. Per Rule 702, Buyer will then provide any required additional financial assurance as soon as practicable but no later than 90 days from the Commission's approval of the *Form 3, Financial Assurance Plan*.

The Selling Operator must file a *Form 3, Financial Assurance Plan* within 10 business days of Form 9 approval. Per Rule 702, Seller will then provide any required additional financial assurance as soon as practicable but no later than 90 days from the Commission's approval of the *Form 3, Financial Assurance Plan*.

Each operator should email me their acceptance of the COAs.

Please let me know if you have any questions.

Have a nice weekend.

Deb