

**From:** [Brittany Rothe](#)  
**To:** [Meghan Grimes](#); [Deborah Bracey - DNR](#)  
**Cc:** [Angela Mallon](#); [Fred Witsell](#); [Cindy Nuffer](#); [Devin Brown](#)  
**Subject:** RE: [EXTERNAL] RE: Form 9 Transfer - Confluence DJ LLC #403249545 to Providence Operating LLC dba POCO Operating  
**Date:** Thursday, May 11, 2023 12:44:41 PM

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Deb,

Similarly, please note Confluence's acceptance of the following COA:

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*.

Thanks!

Brittany

**Brittany Rothe**

C: 303-994-3064

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**From:** Meghan Grimes <MGrimes@providence-energy.com>  
**Sent:** Thursday, May 11, 2023 12:16 PM  
**To:** Deborah Bracey - DNR <deborah.bracey@state.co.us>  
**Cc:** Brittany Rothe <brothe@confluencelp.com>; Angela Mallon <AMallon@confluencelp.com>; Fred Witsell <FWitsell@providence-energy.com>; Cindy Nuffer <CNuffer@providence-energy.com>; Devin Brown <DBrown@providence-energy.com>  
**Subject:** Re: [EXTERNAL] RE: Form 9 Transfer - Confluence DJ LLC #403249545 to Providence Operating LLC dba POCO Operating

Deb -

Please note POCO's acceptance of the following COA:

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*.

Best regards,

**Meghan Grimes**

720.256.8774

On May 11, 2023, at 2:07 PM, Deborah Bracey - DNR <[deborah.bracey@state.co.us](mailto:deborah.bracey@state.co.us)> wrote:

Brittany,

Thank you for sending the explanations. This should be adequate for the purpose of the transfer. I will still need the acceptance of the COAs by both operators. Please respond with your acceptance to this email chain.

Thanks,  
Deb

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**From:** Brittany Rothe <[brothe@confluencelp.com](mailto:brothe@confluencelp.com)>  
**Sent:** Monday, May 8, 2023 9:32 PM  
**To:** Deborah Bracey - DNR <[deborah.bracey@state.co.us](mailto:deborah.bracey@state.co.us)>; Angela Mallon <[AMallon@confluencelp.com](mailto:AMallon@confluencelp.com)>; [Fwitsell@providence-energy.com](mailto:Fwitsell@providence-energy.com)  
**Cc:** Cindy Nuffer <[cnuffer@providence-energy.com](mailto:cnuffer@providence-energy.com)>; Meghan Grimes ([MGrimes@providence-energy.com](mailto:MGrimes@providence-energy.com)) <[mgrimes@providence-energy.com](mailto:mgrimes@providence-energy.com)>; Devin Brown ([DBrown@providence-energy.com](mailto:DBrown@providence-energy.com)) <[dbrown@providence-energy.com](mailto:dbrown@providence-energy.com)>  
**Subject:** RE: Form 9 Transfer - Confluence DJ LLC #403249545 to Providence Operating LLC dba POCO Operating

Good evening, all.

Deb, I took the COGCCs list of unresolved field inspections and added a subject location and/or well name, and an explanation on where things stand regarding corrective actions (CAs).

Meghan and the Providence team, please review this list and let me know if there are any concerns. Most of the CAs are no longer applicable due to the locations/well in question being P&A'd and reclaimed, or from CAs being identified during a phase of operation that's no longer applicable. Multiple times, the CAs weren't documented because they occurred prior to the COGCCs FIRR form helping to organize completion of CAs.

Each inspection highlighted in green in the 'Explanation' column represents FIRs that have been resolved.

Hopefully the commentary on this list makes everything clear. Have a look and let me know what questions there are. Meghan, I will load all pertinent inspections to the Dropbox for your review.

Thanks,

Brittany

**Brittany Rothe**

Engineering Manager

C: 303-994-3064

<image002.jpg>

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**From:** Brittany Rothe

**Sent:** Wednesday, May 3, 2023 8:58 PM

**To:** Deborah Bracey - DNR <[deborah.bracey@state.co.us](mailto:deborah.bracey@state.co.us)>;  
[amallon@confluenacelp.com](mailto:amallon@confluenacelp.com); [Fwitsell@providence-energy.com](mailto:Fwitsell@providence-energy.com)

**Cc:** Cindy Nuffer <[cnuffer@providence-energy.com](mailto:cnuffer@providence-energy.com)>; Meghan Grimes  
([MGrimes@providence-energy.com](mailto:MGrimes@providence-energy.com)) <[mgrimes@providence-energy.com](mailto:mgrimes@providence-energy.com)>; Devin  
Brown ([DBrown@providence-energy.com](mailto:DBrown@providence-energy.com)) <[dbrown@providence-energy.com](mailto:dbrown@providence-energy.com)>

**Subject:** RE: Form 9 Transfer - Confluence DJ LLC #403249545 to Providence Operating  
LLC dba POCO Operating

Deb,

Thank you for working on this Form 9 Transfer. In reviewing the list of FIRs, many of these were resolved years ago at a time when Confluence wasn't yet utilizing the FIR Response process. POCO is aware of and has been working with us on the more recent FIRs noted.

I will prepare a summary of all the FIRs listed and review it with the POCO team to assure them that there are no surprises here. We'll be in touch.

Thank you!  
Brittany

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**From:** Deborah Bracey - DNR <[deborah.bracey@state.co.us](mailto:deborah.bracey@state.co.us)>

**Sent:** Wednesday, May 3, 2023 5:03 PM

**To:** [amallon@confluenacelp.com](mailto:amallon@confluenacelp.com); Brittany Rothe <[brothe@confluenacelp.com](mailto:brothe@confluenacelp.com)>;  
[Fwitsell@providence-energy.com](mailto:Fwitsell@providence-energy.com)

**Cc:** Cindy Nuffer <[cnuffer@providence-energy.com](mailto:cnuffer@providence-energy.com)>

**Subject:** Form 9 Transfer - Confluence DJ LLC #403249545 to Providence Operating LLC  
dba POCO Operating

Good evening All,

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

**Issue 1** – There are 16 Unaccounted For Related Incidents the will need to be accounted for.

**Solution 1** - After reviewing the status of the Form 9, we've identified 16 Field Inspections Reports (FIR) that were issued with corrective actions related to wells and facilities being transferred (See Attached List). These corrective actions 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.

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*.

Please email me with your acceptance.

When re-submitting your Form 3, please use the following comment.

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

Please reach out with any questions.

Thanks,  
Deb

**Caution:** This email originated from outside your organization. Use caution when opening attachments or clicking on embedded links. Please report any suspicious requests or activity.

