

From: [Abigail Wenk](#)
To: [Nathan Bennett](#); [Deborah Bracey - DNR](#)
Subject: RE: Form 9 Transfer - Bison IV Operating LLC #403316281 to Civitas North LLC #403353709
Date: Wednesday, June 21, 2023 10:44:33 AM
Attachments: [image001.png](#)
[image002.png](#)

Bison IV Operating, LLC (Op #10670) accepts 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.*

I was not able to locate any record of follow up inspection.

Thank you,



From: Nathan Bennett <nbennett@civiresources.com>
Sent: Thursday, June 15, 2023 1:31 PM
To: Deborah Bracey - DNR <deborah.bracey@state.co.us>; Abigail Wenk <AWenk@bisonog.com>
Subject: RE: Form 9 Transfer - Bison IV Operating LLC #403316281 to Civitas North LLC #403353709

Hi, Deb:

The FIRR for the below-captioned field inspection was filed on May 5th (copy attached). All CAs were performed, and the form approved, but there is an indication that a follow-up inspection is warranted. As of this writing, I cannot find record of said follow up (unless it went directly to Bison).

Civitas North, LLC (Op #10661) accepts 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,
Nathan

Nathan Bennett

Director, Permitting & Compliance

Civitas Resources | 555 17th St. Ste 3700 | Denver, CO 80202



From: Nathan Bennett

Sent: Thursday, June 15, 2023 9:07 AM

To: Deborah Bracey - DNR <deborah.bracey@state.co.us>; Abigail Wenk <AWenk@bisonog.com>

Subject: RE: Form 9 Transfer - Bison IV Operating LLC #403316281 to Civitas North LLC #403353709

Good Morning, Deb:

I've included Abigail Wenk on this email for Bison as Ms. Morahan is out of the office. I am looking into the status of the FIR and will respond shortly.

Best Regards,
Nathan

Nathan Bennett

Director, Permitting & Compliance

Civitas Resources | 555 17th St. Ste 3700 | Denver, CO 80202

Direct: 303.312.8166 | Cell: 570.932.0776 | nbennett@civiresources.com



From: Deborah Bracey - DNR <deborah.bracey@state.co.us>

Sent: Wednesday, June 14, 2023 2:01 PM

To: Lauren Morahan <lmorahan@bisonog.com>; Nathan Bennett <nbennett@civiresources.com>

Subject: Form 9 Transfer - Bison IV Operating LLC #403316281 to Civitas North LLC #403353709

Good afternoon Lauren and Nathan,

After reviewing the status of the Form 9, we've identified 1 Field Inspection Report (FIR) (Document #708200165) that was issued with corrective actions related to wells and facilities being transferred. The 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.

Both operators will need to respond to this email stating that they accept the Conditions of Approval (COA).

Please use the following verbiage when resubmitting your Form 3.

This Form 3 Document # _____ is submitted because of an approved Form 9 Transfer of Operatorship and it replaces Form 3 document # _____.

Please let me know if you have any questions.

Thanks,
Deb