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April 29, 2025

Colorado Energy and Carbon Management Commission
Attention: Chris Coleman, Enforcement Advisor
1120 Lincoln Street, Suite 801
Denver, CO 80203
via email: chris.coleman.state.co.us

Re: Southern Ute Indian Reservation; Harmon #1 Well – API No. 05-067-05426;
Township 33 North, Range 8 West, Section 17: NE/4NE/4, La Plata County, Colorado

Dear Mr. Coleman:

Representatives of Red Willow Production Company (“Red Willow”), an internal division of the Southern Ute Indian Tribe, appreciated the opportunity to participate in the remote meeting held on Thursday, April 17, 2025, to discuss the status, ownership, and responsibility for overseeing the Harmon #1 Well, which is located within the exterior boundaries of the Southern Ute Indian Reservation (“Reservation”). This letter confirms that Red Willow is the leasehold owner, operator, and party responsible for the Harmon #1 Well, including, without limitation, the wellsite, associated pits, if any, and related disturbed surface associated with the well.

As we discussed in our meeting, the Harmon #1 Well was drilled in 1952, and in 2002, the then-current operator, SG Interests I Ltd. (“SG”), plugged and abandoned the well and filed the appropriate forms with ECMC’s predecessor in name, the Colorado Oil and Gas Conservation Commission. However, the access road to the wellsite and the surface location were not fully reclaimed. In 2005, SG assigned its leasehold interests involving the plugged Harmon #1 Well (and other wells) to Samson Resources Company (“Samson”). On September 16, 2015, Samson commenced a voluntary proceeding under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the District of Delaware, and, on October 28, 2016, the Bankruptcy Court entered an order authorizing the sale of Samson’s oil and gas leases and wells located within the Reservation to Red Willow. Those assets included the lease involving the Harmon #1 Well, and, since receiving the assignment of those interests, Red Willow has been the operator of wells located within those leased lands.

The purpose of our meeting was to identify the current operator of the Harmon #1 Well and to have SG, the last operator listed on ECMC’s records, officially transfer operatorship of the well to the current operator. As the participants in the meeting recognized, ECMC’s regulatory

jurisdiction does not extend to the Tribe or its organizational division, Red Willow, within the boundaries of the Reservation. Accordingly, in lieu of SG filing a Form 9 (Transfer of Operatorship), you and the other ECMC participants suggested that the Red Willow submit this letter confirming its operatorship and associated responsibility for the Harmon #1 Well, the wellsite location, and associated surface-disturbed areas.

No one participating in our remote meeting, including representatives of ECMC, SG, Samson, and Red Willow, is aware of any adverse subsurface condition associated with the Harmon #1 Well. As far as Red Willow is aware, the only current condition that needs to be addressed is the surface on or near the wellsite and the associated access road. Red Willow intends to contact the surface owner of this property and determine whether the surface owner wants to assume responsibility for the condition of the surface or wants Red Willow to proceed with surface abandonment and reclamation. As you know, many surface owners prefer to keep access roads in place, particularly in rural locations, such as this one.

In conclusion, we believe this letter addresses the matters we discussed at the meeting. Please feel free to contact with any comments or questions.

Sincerely,

Nathan Wickett

Nathan Wickett, Land Manager

Email: nwickett@rwpc.us

cc:

Joseph A. Mills (Samson)
Tracy Arnett (SG)
Eric Sanford (SG)
Thomas H. Shipps, Esq.