



September 1, 2024

Ms. Julie Murphy  
Director  
Colorado Energy & Carbon Management Commission  
1120 Lincoln, Ste 801  
Denver, CO 80203

RE: Confidential Asset Transfer Attestation  
Poncho Production Company to Impetro Resources, LLC.  
Form 9-Subsequent, Document # 403904610

Dear Director Murphy:

In accordance with Rule 218.f.1., Transfer of Operatorship – Subsequent, Impetro Resources, LLC. (Impetro), Buying Operator, would like to inform the Colorado Energy and Carbon Management Commission (ECMC) that Poncho Production Company (Poncho) has transferred select assets to Buying Operator Impetro Resources, LLC. (Impetro). The transaction is to be considered confidential and any other associated information confidential pursuant to § 24-72-204(3)(a)(IV), C.R.S. Impetro and Poncho submit this letter of attestation and associated documents to notify the ECMC of the transfer of assets.

Per Rule 218.f.(1), included as Attachment A is the Transferable Items list associated with this transaction. Both Operators agree to the transfer of operatorship of the attached list of Transferable Items and that the attached list of Transferable Items is complete. The transfer was effective September 1, 2024. Impetro has assumed responsibility for all Transferable Items associated in this transaction. Any items not transferring in this transaction will remain the liability of Poncho and Poncho will retain compliance with ECMC rules.

**Selling Operator**

Poncho Production Company  
5299 DTC Blvd #1300  
Greenwood Village, CO 80111  
ECMC Operator # 71450

**Buying Operator**

Impetro Resources, LLC.  
558 Castle Pines Pkwy, Unit B-4  
Castle Pines, CO 80108  
ECMC Operator # 10690

A blue ink signature of Carl Dean, consisting of a stylized 'C' and 'D' followed by a horizontal line.

Carl Dean, Registered Agent

A blue ink signature of Brent Bongers, consisting of a stylized 'B' and 'B' followed by a horizontal line.

Brent Bongers, President/COO

Attachment A Transferable Items  
CC: Trisha Fanning, Ardor Environmental LLC

**Attachment A**

## Transferable Items

| <b>Facility Type</b>  | <b>API # / Facility #</b> | <b>Facility Name</b>     | <b>Qtr Qtr</b> | <b>Section</b> | <b>Township</b> | <b>Range</b> | <b>County</b> |
|-----------------------|---------------------------|--------------------------|----------------|----------------|-----------------|--------------|---------------|
| LEASE                 | 49560                     | EBENDORF                 | NWSW           | 30             | 1N              | 54W          | WASHINGTON    |
| PIT                   | 117807                    | EBENDORF                 | NWSW           | 30             | 1N              | 54W          | WASHINGTON    |
| WELL                  | 121-09173                 | EBENDORFF #1             | NWSW           | 30             | 1N              | 54W          | WASHINGTON    |
| LOCATION              | 317133                    | EBENDORFF-61N54W #30NWSW | NWSW           | 30             | 1N              | 54W          | WASHINGTON    |
| OFF-LOCATION FLOWLINE | 477104                    | Ebendorf flowline        | NWSW           | 30             | 1N              | 54W          | WASHINGTON    |
| LEASE                 | 53162                     | JOLLY 'D' #'S 1 & 3/     | CNW            | 8              | 3S              | 55W          | WASHINGTON    |
| PIT                   | 117777                    | JOLLY "D" 1              | SEnw           | 8              | 3S              | 55W          | WASHINGTON    |
| WELL                  | 121-05672                 | JOLLY #D-1               | SEnw           | 8              | 3S              | 55W          | WASHINGTON    |
| LOCATION              | 316972                    | JOLLY-63S55W #8SEnw      | SEnw           | 8              | 3S              | 55W          | WASHINGTON    |
| PIT                   | 119501                    | JOLLY "D"                | SWNW           | 8              | 3S              | 55W          | WASHINGTON    |