

March 24, 2025

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

Re: Confidential Asset Transfer Attestation  
PADCO LLC to Impetro Resources LLC  
Form 9-Intent, Document #404132319

Dear Director Murphy:

In accordance with Rule 218.b.(1-7) Transfer of Operatorship Intent, PADCO LLC (PADCO), Selling Operator, would like to inform the Energy & Carbon Management Commission (ECMC) that PADCO will be transferring 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. PADCO and Impetro submit this letter of attestation and associated documents to notify the ECMC of the transfer of assets.

Per Rule 218.a.(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. Impetro will revise their financial assurance upon approval of the Form 9 Asset Transfer per Rule 702. The transfer is anticipated to take place March 18, 2025. Impetro will be assuming responsibility for all Transferable Items associated in this transaction. Any Items not transferring in this transaction will remain the liability of PADCO and PADCO will retain compliance with Commission rules.

**Selling Operator**

PADCO LLC  
16508 Arminta Street  
Van Nuys, CA 91406  
ECMC Operator # 24500



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Robert L. Moffitt, Manager

**Buying Operator**

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

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Brent Bongers, President/COO

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

## ATTACHMENT A

Transferable Items:

NO.	API / FACILITY ID	Facility Name	Qtr Qtr	Section	Township	Range	County
1	101039	GARY GEBAUER 2 #	SESE	14	1N	53W	Washington
2	482888	GARY GEBAUER 3 OFF-LOCATION FLOWLINE	NE NE	23	1N	53W	Washington
3	05-121-10379	GARY GEBAUER #2	NENE	23	1N	53W	Washington
4	317290	GARY GEBAUER-61N53W #23NENE	NENE	23	1N	53W	Washington
5	117801	VENRICK "A"	CNW	25	1N	54W	Washington
6	475359	VENRICK "A" 1 OFF-LOCATION FLOWLINE	NWNW	25	1N	54W	Washington
7	101076	VENRICK "A"	NWNW	25	1N	54W	Washington
8	05-121-08071	VENRICK #1-A	NWNW	25	1N	54W	Washington
9	317059	VENRICK-61N54W #25NWNW	NWNW	25	1N	54W	Washington
10	05-121-08075	VENRICK #2-A	SENE	25	1N	54W	Washington
11	317060	VENRICK-61N54W #25SENE	SENE	25	1N	54W	Washington
12	05-121-10559	SHARP #2	SESE	27	1S	55W	Washington
13	257522	SHARP #2	SESE	27	1S	55W	Washington
14	317315	SHARP-61S55W #27SESE	SESE	27	1S	55W	Washington
15	05-121-10597	SHARP-BLAKE #2-B	NESE	28	1S	55W	Washington
16	317324	SHARP-BLAKE-61S55W #28NESE	NESE	28	1S	55W	Washington
17	317334	BACON-61S55W #28NWSE	NWSE	28	1S	55W	Washington
18	05-121-10611	BACON #1A	NWSE	28	1S	55W	Washington
19	258110	BACON 1 A #	NWSE	28	1S	55W	Washington
20	05-121-06883	FASSLER #1	NENE	32	2N	53W	Washington
21	102674	FASSLER 1 #	NENE	32	2N	53W	Washington
22	317037	FASSLER-62N53W #32NENE	NENE	32	2N	53W	Washington
23	159112	FASSLER INJECTION WELL #	NENE	32	2N	53W	Washington
24	05-121-09831	FASSLER #6	NENE	32	2N	53W	Washington
25	317233	FASSLER-62N53W #32NENE	NENE	32	2N	53W	Washington
26	317105	WRIGHT-62S53W #22SWNW	SWNW	22	2S	53W	Washington
27	05-121-08867	WRIGHT #1	SWNW	22	2S	53W	Washington
28	104592	WRIGHT 1	SWNW	22	2S	53W	Washington
29	117693	WRIGHT 1	SWNW	22	2S	53W	Washington