

State of Colorado
Energy & Carbon Management Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203 Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:

404165517

Receive Date:

06/16/2025

TRANSFER OF OPERATORSHIP

A Selling Operator will notify the Commission about the transfer of any Transferable Item associated with its Oil and Gas Operations to a Buying Operator by filing a Form 9, Transfer of Operatorship – Intent, with the Commission at least 30 days, or as soon as practicable, before the anticipated transfer date. (Rule 218.b.) When a transaction subject to a Form 9 – Intent becomes final, the Buying Operator will submit a Form 9 – Subsequent within 7 days of closing. (Rule 218.d.(1).)

Type of Form 9, Transfer of Operatorship: Intent **Subsequent** Intent # 404132319

OPERATOR INFORMATION

SELLING OPERATOR INFORMATION

ECMC Operator Number: <u>24500</u>	Contact Name and Telephone:
Name of Operator: <u>PADCO LLC</u>	Name: <u>Dan Richmond</u>
Address: <u>16508 ARMINTA STREET</u>	Phone: <u>(918) 630-9912</u>
City: <u>VAN NUYS</u> State: <u>CA</u> Zip: <u>91406</u>	Email: <u>dan@dsrinc.net</u>

BUYING OPERATOR INFORMATION

ECMC Operator Number: <u>10690</u>	Contact Name and Telephone:
Name of Operator: <u>IMPETRO RESOURCES LLC</u>	Name: <u>Brent Bongers</u>
Address: <u>558 CASTLE PINES PKWY UNIT B-4</u>	Phone: <u>(361) 935-5633</u>
City: <u>CASTLE PINES</u> State: <u>CO</u> Zip: <u>80108</u>	Email: <u>bbongers@impetroresources.com</u>

TRANSFER INFO

Transfer Dates

Form 9 Intent - Anticipated Date of Transfer: 03/18/2025

Form 9 Subsequent - Effective Date of Transfer: s03/18/2025

Confidentiality

Transfer is Confidential: Yes

Financial Assurance

Form 9 Intent - Estimated amount of Financial Assurance the Buying Operator will submit prior to anticipated date of transfer: \$ 0

Form 9 Subsequent - The Buying Operator's Financial Assurance:

SUBSEQUENT LIABILITY

Rule 218.d.(1).D.i.

"For Transferable Items listed in Rule 218.d.(1).B.i an acknowledgment that upon the effective date of transfer, that the Buying Operator assumes all responsibility for compliance with the Act, the Commission's Rules, and all terms and conditions of existing Permits and Commission orders for the Transferable Items."

In checking this box the Buying Operator's acknowledges the subsequent liability pursuant to Rule 218.d.(1).D.i.

Rule 218.d.(1).D.ii.

"For Transferable Items listed in Rule 218.d.(1).B.ii or iii, an acknowledgment that the Buying Operator may be or may become responsible for compliance with the Act, the Commission's Rules, and all terms and conditions of existing Permits and Commission orders if the Buying Operator takes any action, or fails to take any action, that would cause such Transferable Item to be out of compliance with the Act, the Commission's Rules, and all terms and conditions of existing Permits and Commission orders."

In checking this box the Buying Operator's acknowledges the subsequent liability pursuant to Rule 218.d.(1).D.ii.

Rule 218.d.(1).D.iii.

"For Transferable Items not listed in Rule 218.d.(1).B.i-iii but Related in the Commission's records, an acknowledgment that the Commission will presume that the Transferable Item was transferred, and that the Buying Operator is responsible for compliance with the Act, the Commission's Rules, and all terms and conditions of existing Permits and Commission orders for the Transferable Items."

In checking this box the Buying Operator's acknowledges the subsequent liability pursuant to Rule 218.d.(1).D.iii.



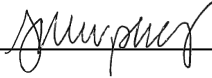
SUBMITTAL

OPERATOR COMMENT AND SUBMITTAL

I hereby certify all statements made in this form are, to the best of my knowledge, true, correct, and complete.

Print Name: Amber Barnett Email: abarnett@ardorenvironmental.com

Title: Compliance Specialist Date: 06/16/2025

ECMC Approved: 

Title: Director of ECMC

Date: 9/4/2025

Wells & Facilities Transferred Summary

1	Facility Type	API	Facility ID	Location ID	Facility Name	QtrQtr	Sec	Twp	Rng
	PIT	-	101039		GARY GEBAUER 2 #	SESE	14	1N	53W
	<u>County</u>	<u>Min.Owner. Type</u>	<u>Current Operator Num</u>	<u>Current Operator Name</u>					
	WASHINGTON		24500	PADCO LLC					
2	Facility Type	API	Facility ID	Location ID	Facility Name	QtrQtr	Sec	Twp	Rng
	FLOWLINE SYSTEM	-	482888		GARY GEBAUER 3 OFF-LOCATION FLOWLINE	NE NE	23	1N	53W
	<u>County</u>	<u>Min.Owner. Type</u>	<u>Current Operator Num</u>	<u>Current Operator Name</u>					
	WASHINGTON		24500	PADCO LLC					
3	Facility Type	API	Facility ID	Location ID	Facility Name	QtrQtr	Sec	Twp	Rng
	WELL	121-10379	237876		GARY GEBAUER #2	NENE	23	1N	53W
	<u>County</u>	<u>Min.Owner. Type</u>	<u>Current Operator Num</u>	<u>Current Operator Name</u>					
	WASHINGTON	FEE	24500	PADCO LLC					
4	Facility Type	API	Facility ID	Location ID	Facility Name	QtrQtr	Sec	Twp	Rng
	LOCATION	-	317290	317290	GARY GEBAUER-61N53W #23NENE	NENE	23	1N	53W
	<u>County</u>	<u>Min.Owner. Type</u>	<u>Current Operator Num</u>	<u>Current Operator Name</u>					
	WASHINGTON		24500	PADCO LLC					
5	Facility Type	API	Facility ID	Location ID	Facility Name	QtrQtr	Sec	Twp	Rng
	PIT	-	117801		VENRICK "A"	CNW	25	1N	54W
	<u>County</u>	<u>Min.Owner. Type</u>	<u>Current Operator Num</u>	<u>Current Operator Name</u>					
	WASHINGTON		24500	PADCO LLC					
6	Facility Type	API	Facility ID	Location ID	Facility Name	QtrQtr	Sec	Twp	Rng
	OFF-LOCATION FLOWLINE	-	475359		VENRICK "A" 1 OFF-LOCATION FLOWLINE	NWNW	25	1N	54W
	<u>County</u>	<u>Min.Owner. Type</u>	<u>Current Operator Num</u>	<u>Current Operator Name</u>					
	WASHINGTON		24500	PADCO LLC					
7	Facility Type	API	Facility ID	Location ID	Facility Name	QtrQtr	Sec	Twp	Rng
	PIT	-	101076		VENRICK "A"	NWNW	25	1N	54W
	<u>County</u>	<u>Min.Owner. Type</u>	<u>Current Operator Num</u>	<u>Current Operator Name</u>					
	WASHINGTON		24500	PADCO LLC					
8	Facility Type	API	Facility ID	Location ID	Facility Name	QtrQtr	Sec	Twp	Rng
	WELL	121-08071	235581		VENRICK #1-A	NWNW	25	1N	54W
	<u>County</u>	<u>Min.Owner. Type</u>	<u>Current Operator Num</u>	<u>Current Operator Name</u>					
	WASHINGTON	FEE	24500	PADCO LLC					
9	Facility Type	API	Facility ID	Location ID	Facility Name	QtrQtr	Sec	Twp	Rng
	LOCATION	-	317059	317059	VENRICK-61N54W #25NWNW	NWNW	25	1N	54W
	<u>County</u>	<u>Min.Owner. Type</u>	<u>Current Operator Num</u>	<u>Current Operator Name</u>					

	WASHINGTON		24500	PADCO LLC					
10	<u>Facility Type</u>	<u>API</u>	<u>Facility ID</u>	<u>Location ID</u>	<u>Facility Name</u>	<u>QtrQtr</u>	<u>Sec</u>	<u>Twp</u>	<u>Rng</u>
	WELL	121-08075	235585		VENRICK #2-A	SENW	25	1N	54W
	<u>County</u>	<u>Min.Owner. Type</u>	<u>Current Operator Num</u>	<u>Current Operator Name</u>					
	WASHINGTON	FEE	24500	PADCO LLC					
11	<u>Facility Type</u>	<u>API</u>	<u>Facility ID</u>	<u>Location ID</u>	<u>Facility Name</u>	<u>QtrQtr</u>	<u>Sec</u>	<u>Twp</u>	<u>Rng</u>
	LOCATION	-	317060	317060	VENRICK-61N54W #25SENW	SENW	25	1N	54W
	<u>County</u>	<u>Min.Owner. Type</u>	<u>Current Operator Num</u>	<u>Current Operator Name</u>					
	WASHINGTON		24500	PADCO LLC					
12	<u>Facility Type</u>	<u>API</u>	<u>Facility ID</u>	<u>Location ID</u>	<u>Facility Name</u>	<u>QtrQtr</u>	<u>Sec</u>	<u>Twp</u>	<u>Rng</u>
	WELL	121-10559	238056		SHARP #2	SESE	27	1S	55W
	<u>County</u>	<u>Min.Owner. Type</u>	<u>Current Operator Num</u>	<u>Current Operator Name</u>					
	WASHINGTON	FEE	24500	PADCO LLC					
13	<u>Facility Type</u>	<u>API</u>	<u>Facility ID</u>	<u>Location ID</u>	<u>Facility Name</u>	<u>QtrQtr</u>	<u>Sec</u>	<u>Twp</u>	<u>Rng</u>
	PIT	-	257522		SHARP #2	SESE	27	1S	55W
	<u>County</u>	<u>Min.Owner. Type</u>	<u>Current Operator Num</u>	<u>Current Operator Name</u>					
	WASHINGTON		24500	PADCO LLC					
14	<u>Facility Type</u>	<u>API</u>	<u>Facility ID</u>	<u>Location ID</u>	<u>Facility Name</u>	<u>QtrQtr</u>	<u>Sec</u>	<u>Twp</u>	<u>Rng</u>
	LOCATION	-	317315	317315	SHARP-61S55W #27SESE	SESE	27	1S	55W
	<u>County</u>	<u>Min.Owner. Type</u>	<u>Current Operator Num</u>	<u>Current Operator Name</u>					
	WASHINGTON		24500	PADCO LLC					
15	<u>Facility Type</u>	<u>API</u>	<u>Facility ID</u>	<u>Location ID</u>	<u>Facility Name</u>	<u>QtrQtr</u>	<u>Sec</u>	<u>Twp</u>	<u>Rng</u>
	WELL	121-10597	238094		SHARP-BLAKE #2-B	NESE	28	1S	55W
	<u>County</u>	<u>Min.Owner. Type</u>	<u>Current Operator Num</u>	<u>Current Operator Name</u>					
	WASHINGTON	FEE	24500	PADCO LLC					
16	<u>Facility Type</u>	<u>API</u>	<u>Facility ID</u>	<u>Location ID</u>	<u>Facility Name</u>	<u>QtrQtr</u>	<u>Sec</u>	<u>Twp</u>	<u>Rng</u>
	LOCATION	-	317324	317324	SHARP-BLAKE-61S55W #28NESE	NESE	28	1S	55W
	<u>County</u>	<u>Min.Owner. Type</u>	<u>Current Operator Num</u>	<u>Current Operator Name</u>					
	WASHINGTON		24500	PADCO LLC					
17	<u>Facility Type</u>	<u>API</u>	<u>Facility ID</u>	<u>Location ID</u>	<u>Facility Name</u>	<u>QtrQtr</u>	<u>Sec</u>	<u>Twp</u>	<u>Rng</u>
	LOCATION	-	317334	317334	BACON-61S55W #28NWSE	NWSE	28	1S	55W
	<u>County</u>	<u>Min.Owner. Type</u>	<u>Current Operator Num</u>	<u>Current Operator Name</u>					
	WASHINGTON		24500	PADCO LLC					
18	<u>Facility Type</u>	<u>API</u>	<u>Facility ID</u>	<u>Location ID</u>	<u>Facility Name</u>	<u>QtrQtr</u>	<u>Sec</u>	<u>Twp</u>	<u>Rng</u>
	WELL	121-10611	238108		BACON #1A	NWSE	28	1S	55W
	<u>County</u>	<u>Min.Owner. Type</u>	<u>Current Operator Num</u>	<u>Current Operator Name</u>					
	WASHINGTON	FEE	24500	PADCO LLC					

19	<u>Facility Type</u>	<u>API</u>	<u>Facility ID</u>	<u>Location ID</u>	<u>Facility Name</u>	<u>QtrQtr</u>	<u>Sec</u>	<u>Twp</u>	<u>Rng</u>
	PIT	-	258110		BACON 1 A #	NWSE	28	1S	55W
	<u>County</u>	<u>Min.Owner. Type</u>	<u>Current Operator Num</u>	<u>Current Operator Name</u>					
	WASHINGTON		24500	PADCO LLC					
20	<u>Facility Type</u>	<u>API</u>	<u>Facility ID</u>	<u>Location ID</u>	<u>Facility Name</u>	<u>QtrQtr</u>	<u>Sec</u>	<u>Twp</u>	<u>Rng</u>
	WELL	121-06883	234746		FASSLER #1	NENE	32	2N	53W
	<u>County</u>	<u>Min.Owner. Type</u>	<u>Current Operator Num</u>	<u>Current Operator Name</u>					
	WASHINGTON	FEE	24500	PADCO LLC					
21	<u>Facility Type</u>	<u>API</u>	<u>Facility ID</u>	<u>Location ID</u>	<u>Facility Name</u>	<u>QtrQtr</u>	<u>Sec</u>	<u>Twp</u>	<u>Rng</u>
	PIT	-	102674		FASSLER 1 #	NENE	32	2N	53W
	<u>County</u>	<u>Min.Owner. Type</u>	<u>Current Operator Num</u>	<u>Current Operator Name</u>					
	WASHINGTON		24500	PADCO LLC					
22	<u>Facility Type</u>	<u>API</u>	<u>Facility ID</u>	<u>Location ID</u>	<u>Facility Name</u>	<u>QtrQtr</u>	<u>Sec</u>	<u>Twp</u>	<u>Rng</u>
	LOCATION	-	317037	317037	FASSLER-62N53W #32NENE	NENE	32	2N	53W
	<u>County</u>	<u>Min.Owner. Type</u>	<u>Current Operator Num</u>	<u>Current Operator Name</u>					
	WASHINGTON		24500	PADCO LLC					
23	<u>Facility Type</u>	<u>API</u>	<u>Facility ID</u>	<u>Location ID</u>	<u>Facility Name</u>	<u>QtrQtr</u>	<u>Sec</u>	<u>Twp</u>	<u>Rng</u>
	UIC DISPOSAL	-	159112		FASSLER INJECTION WELL #	NENE	32	2N	53W
	<u>County</u>	<u>Min.Owner. Type</u>	<u>Current Operator Num</u>	<u>Current Operator Name</u>					
	WASHINGTON		24500	PADCO LLC					
24	<u>Facility Type</u>	<u>API</u>	<u>Facility ID</u>	<u>Location ID</u>	<u>Facility Name</u>	<u>QtrQtr</u>	<u>Sec</u>	<u>Twp</u>	<u>Rng</u>
	WELL	121-09831	237330		FASSLER #6	NENE	32	2N	53W
	<u>County</u>	<u>Min.Owner. Type</u>	<u>Current Operator Num</u>	<u>Current Operator Name</u>					
	WASHINGTON	FEE	24500	PADCO LLC					
25	<u>Facility Type</u>	<u>API</u>	<u>Facility ID</u>	<u>Location ID</u>	<u>Facility Name</u>	<u>QtrQtr</u>	<u>Sec</u>	<u>Twp</u>	<u>Rng</u>
	LOCATION	-	317233	317233	FASSLER-62N53W #32NENE	NENE	32	2N	53W
	<u>County</u>	<u>Min.Owner. Type</u>	<u>Current Operator Num</u>	<u>Current Operator Name</u>					
	WASHINGTON		24500	PADCO LLC					
26	<u>Facility Type</u>	<u>API</u>	<u>Facility ID</u>	<u>Location ID</u>	<u>Facility Name</u>	<u>QtrQtr</u>	<u>Sec</u>	<u>Twp</u>	<u>Rng</u>
	LOCATION	-	317105	317105	WRIGHT-62S53W #22SWNW	SWNW	22	2S	53W
	<u>County</u>	<u>Min.Owner. Type</u>	<u>Current Operator Num</u>	<u>Current Operator Name</u>					
	WASHINGTON		24500	PADCO LLC					
27	<u>Facility Type</u>	<u>API</u>	<u>Facility ID</u>	<u>Location ID</u>	<u>Facility Name</u>	<u>QtrQtr</u>	<u>Sec</u>	<u>Twp</u>	<u>Rng</u>
	WELL	121-08867	236377		WRIGHT #1	SWNW	22	2S	53W
	<u>County</u>	<u>Min.Owner. Type</u>	<u>Current Operator Num</u>	<u>Current Operator Name</u>					
	WASHINGTON	FEE	24500	PADCO LLC					

28	<u>Facility Type</u>	<u>API</u>	<u>Facility ID</u>	<u>Location ID</u>	<u>Facility Name</u>	<u>QtrQtr</u>	<u>Sec</u>	<u>Twp</u>	<u>Rng</u>
	PIT	-	104592		WRIGHT 1	SWNW	22	2S	53W
	<u>County</u>	<u>Min.Owner. Type</u>	<u>Current Operator Num</u>	<u>Current Operator Name</u>					
	WASHINGTON		24500	PADCO LLC					
29	<u>Facility Type</u>	<u>API</u>	<u>Facility ID</u>	<u>Location ID</u>	<u>Facility Name</u>	<u>QtrQtr</u>	<u>Sec</u>	<u>Twp</u>	<u>Rng</u>
	PIT	-	117693		WRIGHT 1	SWNW	22	2S	53W
	<u>County</u>	<u>Min.Owner. Type</u>	<u>Current Operator Num</u>	<u>Current Operator Name</u>					
	WASHINGTON		24500	PADCO LLC					

Incidents Transferred Summary

1	<u>Document Numbers</u>	<u>Incident Type</u>	<u>Incident Date</u>	<u>Current Op #</u>	<u>Current Op. Name</u>
	200381240	OPEN REMEDIATION PROJECT	05/16/2013	24500	PADCO LLC

Related Wells & Facilities Not Transferred Summary

< No row provided >

Related Incidents Not Transferred Summary

< No row provided >

Wells & Facilities Proposed Not Transferred Summary

< No row provided >

Incidents Proposed Not Transferred Summary

< No row provided >

ATTACHMENT LIST

Att Doc Num	Name
404165517	Form 09 SUBMITTED
404175372	FORM 9 SUBSEQUENT ATTESTATION
404175384	BUYER NOTIFIED LOCAL GOVT ATTESTATION
404176760	EDD-S-WELLS-FACILITIES-TRANSFERRED
404241702	EDD-S-INCIDENTS-TRANSFERRED

Total Attach: 5 Files

COA Type**Description**

	<p>Buying operator Impetro Resources LLC (RHVO), ("Buyer")will comply with Rule 218.b. (5).A.iii.aa requiring replacement of Selling Operator, Padco LLC("Selling"), existing Single Well Financial Assurance in the amount of \$177,000.00. The replacement Financial Assurance contribution total will be in addition to the Form 3A – Financial Assurance total Adjusted Financial Assurance Amount, and will be due and made part of the Form 3A – Financial Assurance submission. The Form 3A submission and total Adjusted Financial Assurance Amount is due as soon as practicable but no later than within 90 days of the Form 3 – Financial Assurance Plan approval date. This will result in Buyer entering and allocating new and existing instruments within the Form 3A – Financial Assurance to fully fund both the total Financial Assurance Plan Amount as reflected for Buyer initial contribution year and the Selling replacement Financial Assurance contribution amount. This will include the calculated Form 3 – Financial Assurance Plan initial Contribution Amount, Buyer currently held existing Active amount of \$573640.00, and the \$177,000.00 Selling Single Well Financial Assurance contributed balance as of the date of the Form 9 transfer.</p>
	<p>Buying Operator must file a Form 10 within 30 calendar days of the date of this approval.</p>
	<p>The BUYING Operator must file an updated Form 3, Financial Assurance Plan, within 7 calendar days of Form 9 approval.</p>

3 COAs

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Financial Assurance	Buying and Selling Operators are to work collectively to ensure all Production is properly reported	09/03/2025
Total: 1 comment(s)		