

**Valkyrie Operating LLC**

1600 Stout St., Suite 1000  
Denver, CO 80202



December 10, 2021

**Form 9 Subsequent – Seller Retains Responsibility**

This document will serve as Subsequent Attestation of the Seller Retaining Responsibility as part of Rule 218.d.(1).C.ii for the retention of compliance responsibility of oil and gas assets that were proposed in the Form 9 Intent related to the transaction between Valkyrie Operating LLC (10725) and Impetro Resources LLC (10690). This document will be part of the Form 9 subsequent document numbered 402614170. **Attachment B** lists all the items listed in the Form 9 intent, that were NOT transferred. **Attachment C** lists all transferrable items that are related to transferred items that were NOT transferred in the transaction.

**Selling Operator**

Valkyrie Operating LLC  
1600 Stout St., Suite 1000  
Denver, CO 80202  
COGCC Operator #10725

I, Stephen Lucado, CEO of Valkyrie Operating, agree to the retention of compliance responsibilities of the items listed in Attachment B and Attachment C.

A handwritten signature in blue ink, appearing to read 'Stephen Lucado', is written over a horizontal line.

Stephen Lucado, CEO

12-13-21

Date

## Attachment B

### Items Not Transferred

RE: Doc\_ID 402614170

Selling Operator: Valkyrie Operating LLC

COGCC Operator # 10725

Buying Operator: Impetro Resources LLC

COGCC Operator # 10690

Facility Type	Facility Name	API County Code	API Sequence Num	Facility ID	Location ID
LOCATION	JONES-DUPREE-63S51W 26SENE			400050	400050
PIT	RUSH WILLADEL CANTRAL BATTERY			117546	317270

## Attachment C

### Subsequent Related Events Not Transferred

RE: Doc\_ID 402614170

Selling Operator: Valkyrie Operating LLC

COGCC Operator # 10725

Buying Operator: Impetro Resources LLC

COGCC Operator # 10690

Document Number	Compliance Responsibility Operator	Operator Number	Incident Date
402875317	Valkyrie Operating LLC	10725	12/01/2020