



December 15, 2021

Ms. Julie Murphy  
Director  
Colorado Oil and Gas Conservation Commission  
1120 Lincoln, Ste 801  
Denver, CO 80203

Re: Confidential Asset Transfer Attestation TOP Operating Company to Petro Operating LLC, Intent  
Seller Retains Responsibility Attestation  
Form 9 – Subsequent, Document # 402649871

Dear Director Murphy:

In accordance with Rule 218.d.(1).C.ii, TOP Operating Company (TOP), Selling Operator, would like to inform the Colorado Oil and Gas Conservation Commission (COGCC) that TOP will retain compliance responsibility for the Related but Not Transferring Unresolved Field Inspections after its transfer of assets to the Buying Operator, Petro Operating Company, LLC (Petro).

Per Rule 218.d.(1).C.ii, included as Attachment A is the list of Related but Not Transferring Incidents of Unresolved Field Inspections.

**Selling Operator**  
TOP Operating Company  
3609 Wadsworth Blvd., Suite 340  
Lakewood, CO 80235  
COGCC Operator # 39560

  
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Rodney K. Herring, President

Attachment A – Related but Not Transferring Incidents

## Related Incidents Not Transferred to Buyer

Item #	Document Number	Incident Type	Incident Date	Current Operator Number	Current Operator Name	Compliance Responsibility Operator Number	Compliance Responsibility Operator Name
1	673800769	Unresolved Field Inspe	4/21/2014	39560	39560	39560	39560
2	685502493	Unresolved Field Inspe	4/19/2017	39560	39560	39560	39560
3	685502496	Unresolved Field Inspe	4/19/2017	39560	39560	39560	39560
4	685503361	Unresolved Field Inspe	7/20/2017	39560	39560	39560	39560
5	685503364	Unresolved Field Inspe	7/20/2017	39560	39560	39560	39560
6	699301831	Unresolved Field Inspe	5/20/2020	39560	39560	39560	39560