

From: [Andrew Price](#)
To: [Nolan Redmond](#); [Deborah Bracey - DNR](#)
Cc: [Jarrett Ellis - DNR](#)
Subject: RE: Form 9 Intent #402611285 and Subsequent #402893108
Date: Thursday, March 10, 2022 11:12:30 AM

Yes, both are good with me.

Thanks everyone.

Andrew Price

aprice@arkomaops.com

Mobile: 918.260.8324

Office: 918.965.0044

From: Nolan Redmond <nredmond@catamountep.com>
Sent: Thursday, March 10, 2022 11:46 AM
To: Deborah Bracey - DNR <deborah.bracey@state.co.us>; Andrew Price <aprice@arkomaops.com>
Cc: Jarrett Ellis - DNR <jarrett.ellis@state.co.us>
Subject: RE: Form 9 Intent #402611285 and Subsequent #402893108

Hey Deb,

Both those changes sound good to me, looks like I missed deleting that line.

Thanks,

Nolan Redmond

nredmond@catamountep.com

720-484-2347 (office)

303-909-3587 (cell)



From: Deborah Bracey - DNR <deborah.bracey@state.co.us>
Sent: Thursday, March 10, 2022 10:44 AM
To: Nolan Redmond <nredmond@catamountep.com>; Andrew Price <aprice@arkomaops.com>
Cc: Jarrett Ellis - DNR <jarrett.ellis@state.co.us>
Subject: RE: Form 9 Intent #402611285 and Subsequent #402893108

All,

Pit 119541 is still on the Related Facilities Not Transferred List. If both you concur, I will remove it from the list since it has been added to the Wells and Facilities Transferred List.

Also, I will rename the Wells and Facilities Proposed List to Wells and Facilities Transferred List and upload it to Subsequent document #402893108 if you both concur.

Please let me know.

Thanks,
Deb

Deborah Bracey
Accountant



P 303.894.2100 X5134 | F 303.894.2109
1120 Lincoln Street, Suite 801, Denver, CO 80203
deborah.bracey@state.co.us | www.colorado.gov/cogcc

From: Nolan Redmond <nredmond@catamountep.com>
Sent: Thursday, March 10, 2022 10:22 AM
To: Andrew Price <aprice@arkomaops.com>; Deborah Bracey - DNR <deborah.bracey@state.co.us>
Cc: Jarrett Ellis - DNR <jarrett.ellis@state.co.us>
Subject: RE: Form 9 Intent #402611285 and Subsequent #402893108

Good Morning Deb/Jarrett,

Attached is the updated retained incidents attestation document with the retained incident number, the updated wells and facilities proposed to be transferred with pit 119541 added, and the related wells and facilities list that is not being transferred. I removed the closed pits as discussed yesterday afternoon. Please let us know if something doesn't look right or we need to make any other changes.

Thanks for all the help with this,

Nolan Redmond
nredmond@catamountep.com
720-484-2347 (office)
303-909-3587 (cell)



From: Andrew Price <aprice@arkomaops.com>
Sent: Thursday, March 10, 2022 10:09 AM
To: Nolan Redmond <nredmond@catamountep.com>; Deborah Bracey - DNR <deborah.bracey@state.co.us>
Cc: Jarrett Ellis - DNR <jarrett.ellis@state.co.us>
Subject: RE: Form 9 Intent #402611285 and Subsequent #402893108

Deb and Jarrett,

I spoke with Nolan and Arkoma will accept the transfer of DocFid 119541 MILLER MESAVERDE PIT as it is still an active pit used by the Miller Mesaverde Unit #1.

Andrew Price

aprice@arkomaops.com

Mobile: 918.260.8324

Office: 918.965.0044

From: Nolan Redmond <nredmond@catamountep.com>
Sent: Wednesday, March 9, 2022 9:23 AM
To: Deborah Bracey - DNR <deborah.bracey@state.co.us>; Andrew Price <aprice@arkomaops.com>
Cc: Jarrett Ellis - DNR <jarrett.ellis@state.co.us>
Subject: RE: Form 9 Intent #402611285 and Subsequent #402893108

Good Morning Deb,

Attached is the list you sent over and what I could find about those facilities. Do abandoned locations/closed pits/PA wells that are still in the previous operator's name (before Catamount) need to be on the list? The producing wells that are on the list you sent are on shared locations and belong to other operators, and the locations on the list are also shared locations but in another operator's name. There are also several closed pits on the list the Catamount closed. Do any of these need to be on the list?

Problem 2: Attached is the incidents retained list that should have went with the Seller Retains Responsibility Attestation.

Let me know if there is anything else we need to get this to the finish line.

Thanks,

Nolan Redmond

nredmond@catamountep.com

720-484-2347 (office)

303-909-3587 (cell)



From: Deborah Bracey - DNR <deborah.bracey@state.co.us>
Sent: Tuesday, March 8, 2022 5:58 PM
To: Nolan Redmond <nredmond@catamountep.com>; Andrew Price <aprice@arkomaops.com>
Cc: Jarrett Ellis - DNR <jarrett.ellis@state.co.us>
Subject: RE: Form 9 Intent #402611285 and Subsequent #402893108

Nolan and Andrew,

Thank you for your patience as we continue to work through our backlog of Form 9s. After uploading the corrected documents, I noticed a couple of items that still need attention.

Problem 1: There are 30 Related Facilities that need to be accounted for.

Solution 1: If the Related Facilities are included in the transfer, then they need to be added to the Wells and Facilities Transferred List. If they are to be retained by the seller, then the facilities need to be referenced on a Related Wells and Facilities – Not Transferred List. I have attached the wells and facilities for your review. There are two highlighted rows. One is for a spill/release that has been closed. It can be removed from the list. The other spill/release is included on the Incidents Transferred List. It can also be removed from this list. I am happy to upload a revised Wells and Facilities Transferred list if applicable.

Problem 2: The Seller Retains Responsibility Attestation indicates that there is an attached list with the Attestation. No list was provided with the Attestation.

Solution 2: Please revise the Attestation to include the list of incidents. If the Seller is to retain the Related Facilities referenced in Problem 1, please revise the Attestation to include that verbiage and a list of Related Facilities Not Transferred. The revised Attestation can be emailed to me as well as the Related Wells and Facilities List Not Transferred, if applicable and I will upload it(them) to the form.

Please reach out if you have any questions.

Thanks,
Deb

Deborah Bracey
Accountant



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From: Nolan Redmond <nredmond@catamountep.com>
Sent: Friday, February 4, 2022 10:14 AM
To: Andrew Price <aprice@arkomaops.com>; Deborah Bracey - DNR <deborah.bracey@state.co.us>
Cc: Ellis - DNR, Jarrett <jarrett.ellis@state.co.us>
Subject: RE: Form 9 Intent #402611285 and Subsequent #402893108

Hey Deb,

Just wanted to follow up again and check to make sure you have everything you needed from us on this.

Thanks for all the help,

Nolan Redmond
nredmond@catamountep.com
720-484-2347 (office)
303-909-3587 (cell)



From: Andrew Price <aprice@arkomaops.com>
Sent: Wednesday, January 19, 2022 5:23 AM
To: Deborah Bracey - DNR <deborah.bracey@state.co.us>; Nolan Redmond <nredmond@catamountep.com>
Cc: Ellis - DNR, Jarrett <jarrett.ellis@state.co.us>
Subject: RE: Form 9 Intent #402611285 and Subsequent #402893108

Deb, please let me know if you need anything else from me to get this done.

Thanks again for all your help.

Andrew Price
aprice@arkomaops.com
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Office: 918.965.0044

From: Andrew Price

Sent: Tuesday, January 18, 2022 10:13 AM

To: Deborah Bracey - DNR <deborah.bracey@state.co.us>; Nolan Redmond <nredmond@catamountep.com>

Cc: Ellis - DNR, Jarrett <jarrett.ellis@state.co.us>

Subject: RE: Form 9 Intent #402611285 and Subsequent #402893108

Deb, please see the attached LGD attestation. Could you please upload to the Form 9 – Subsequent?

Andrew Price

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Mobile: 918.260.8324

Office: 918.965.0044

From: Andrew Price

Sent: Tuesday, January 18, 2022 8:50 AM

To: Deborah Bracey - DNR <deborah.bracey@state.co.us>; Nolan Redmond <nredmond@catamountep.com>

Cc: Ellis - DNR, Jarrett <jarrett.ellis@state.co.us>

Subject: RE: Form 9 Intent #402611285 and Subsequent #402893108

Deb,

First off, thank you very much for the diligent replies and sticking with us to get the final details knocked out.

Problem 1:

Please see attached for Solution 1.2 xls sheet. Please use tab called W&F Proposed_v2 for the upload.

Problem 2:

Both of those items need to be transferred. I accidentally left the spill off but the field inspection is new and was not on the list I was working off.

Deb – could you please add both of these based on the second attachment, tab _v2?

Problem 3:

Nolan/Deb – I looked at the actual document for this and did not see the the information needed for “Compliance Responsibility Operator Number” and “Compliance Responsibility Operator Name” but I assume this is the same as columns E and F so I’ve added that to the third attachment, tab _v2.

Deb, if this is correct could you please upload?

Problem 4:

Deb, sorry I missed your call Friday but I understand what needs to be done and I'll get a new document created, signed and sent you for upload, if you don't mind.

Andrew Price

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From: Deborah Bracey - DNR <deborah.bracey@state.co.us>

Sent: Friday, January 14, 2022 6:57 PM

To: Andrew Price <aprice@arkomaops.com>; Nolan Redmond <nredmond@catamountep.com>

Cc: Ellis - DNR, Jarrett <jarrett.ellis@state.co.us>

Subject: Form 9 Intent #402611285 and Subsequent #402893108

Nolan and Andrew,

After reviewing both Form 9s there are several issued that need to be resolved. They are as follows:

Problem 1: There are 3 PITs that are closed and should be removed from the Wells and Facilities Transferred list. They are as follows:

<u>Facility</u>	<u>Location</u>	
115631	325128	MCELVAIN DAKOTA 1 #
115630	325123	MCELVAIN HARMON 1 #
115752	325156	FORD OLSON UNIT 1 #

I can return the subsequent to draft and you can upload a new list.

Solution 1.2: You can submit a revised list of Wells and Facilities Transferred list and I will upload it for you.

Problem 2: Thank you for your email dated January 10th with your research explaining that all but 2 Unresolved Field Inspections with Corrective Actions have been resolved. *If the parties perform the research and determine that all corrective actions for a particular FIR have been resolved, that FIR does not need to be listed on the Form 9 but will be subject to Rule 218.d(1)D.iii.*

There is one additional Unresolved Field Inspection with Corrective Action and an Unresolved Spill They are as follows:

Document #693904045 Facility ID 306801 Incident Date 12/22/2021

Document #401422732 Facility ID 452581 Incident Date 10/06/2017

Solution 2.1: If the compliance responsibility for such an FIR and/or Unresolved Spill transfers to the buyer include that FIR and/or Unresolved Spill on a Related Incidents Transferred list.

Solution 2.2: If the compliance responsibility for such an FIR and/or Unresolved Spill is retained by the seller then include that FIR and/or Unresolved Spill on a Related Incidents Not Transferred list and update the current Seller Retains Responsibility Attestation in accordance with page 5 of the Attestation Guidance document. Please make sure you reference the Subsequent document

number.

Problem 3: The Related Incidents Not Transferred list is incomplete.

Solution 3: Complete columns G and H for all incidents to be retained by the Seller. I can return the document to draft or you can email me the correction and I will upload the document. Also please revise to include any applicable incidents from Problem 2.

Problem 4: The Buyer Notified Local Gov't Attestation is inadequate and needs revision.

Solution 4: As explained in the Attestation Guidance document, this attestation only needs to state that you have notified the appropriate Local Government Designee (include their name and county) that the notification includes a list of all transferred items within their jurisdiction and includes the printed name, signature and title of the representative for the Buying Operator. We do not need an actual copy of what you sent to the LGD. You only have to attest to do it. I have attached the Attestation Guidance for your reference.

Please reach out if you have any questions.

Have a nice weekend,

Deb

Deborah Bracey
Accountant



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