

State of Colorado
Oil and Gas Conservation Commission

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



Document Number:

402636032

Receive Date:

03/22/2021

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 # _____

OPERATOR INFORMATION

SELLING OPERATOR INFORMATION

OGCC Operator Number: 6720 Contact Name and Telephone: _____
Name of Operator: ROBERT L BAYLESS PRODUCER LLC Name: HELEN TRUJILLO
Address: 621 17TH ST STE 2300 Phone: (505) 5647801
City: DENVER State: CO Zip: 80293 Email: NOTICES@RLBAYLESS.COM

BUYING OPERATOR INFORMATION

OGCC Operator Number: 74290 Contact Name and Telephone: _____
Name of Operator: RETAMCO OPERATING INC Name: JOE GLENNON
Address: PO BOX 790 Phone: (406) 4461568
City: RED LODGE State: MT Zip: 59068 Email: JOEGLENNON@RETAMCO.COM

TRANSFER INFO

Transfer Dates

Form 9 Intent - Anticipated Date of Transfer: 03/22/2021

Form 9 Subsequent - Effective Date of Transfer: _____ s

Confidentiality

Transfer is Confidential: No

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

TWO PITS WERE NOT ON ORIGINAL FORM 19 (DOC ID 402225103) DATED 08/01/2019 (APPROVED 04/23/2020) WHEN WELLS WERE SOLD TO RETAMCO. CORRECTING OVERSITE. PLEASE SEE ATTACHED BLM SUNDRY ALSO REGARDING INTENT OF SALE OF ENTIRE WELL SITES.

INSERTED \$0 FOR FINANCIAL ASSURANCE (FOR FORM VALIDATION). THE FINANCIAL ASSURANCE WOULD BE THE ORIGINAL FINANCIAL ASSURANCE AS ORIGINAL CHANGE OF OP DOC ID402225103.

WELL SITES INVOLVED ARE PHILADELPHIA CREEK1 AND 21.

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

Print Name: HELEN TRUJILLO

Email: NOTICES@RLBAYLESS.COM

Signature:

Title: PROD & REG

Date: 03/22/2021

Wells & Facilities Proposed for Transfer Summary

| | | | | | | | | | |
|---|----------------------|------------------------|-----------------------------|-------------------------------|----------------------|---------------|------------|------------|------------|
| 1 | <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 | 103-07704 | 117270 | 314990 | PHILADELPHIA | SWSW | 3 | 2S | 101W |
| | <u>County</u> | <u>Min.Owner. Type</u> | <u>Current Operator Num</u> | <u>Current Operator Name</u> | | | | | |
| | RIO BLANCO | | 6720 | ROBERT L BAYLESS PRODUCER LLC | | | | | |
| 2 | <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 | 103-08362 | 117163 | 315358 | PHILADELPHIA | SENE | 15 | 2S | 101W |
| | <u>County</u> | <u>Min.Owner. Type</u> | <u>Current Operator Num</u> | <u>Current Operator Name</u> | | | | | |
| | RIO BLANCO | | 6720 | ROBERT L BAYLESS PRODUCER LLC | | | | | |

Incidents Proposed for Transfer Summary

< No row provided >

Related Wells & Facilities Not Proposed for Transfer Summary

< No row provided >

Related Incidents Not Proposed for Transfer Summary

< No row provided >

Attachment List

Att Doc Num

Name

| | |
|-----------|---------------------------------|
| 402636032 | Form 09 SUBMITTED |
| 402636196 | FORM 9 INTENT ATTESTATION |
| 402636207 | EDD-I-WELLS-FACILITIES-PROPOSED |

Total Attach: 3 Files

Condition of Approval

COA Type

Description

| | |
|-------|--|
| | |
| 0 COA | |

General Comments

| <u>User Group</u> | <u>Comment</u> | <u>Comment Date</u> |
|---------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|
| Financial Assurance | Both Operators have resolved all issues. Form 9 Approved | 07/14/2022 |
| Financial Assurance | <p>There are a couple issue with your attachments.</p> <p>For the Subsequent Attestation, please reference the Subsequent document number, not the Intent document number in the attestation.</p> <p>For the Wells and Facilities Transferred list, only wells have API numbers. There are two pits listed with API numbers. Please remove the API numbers associated with the pits. Also, the current operator should be Robert L. Bayless, Producer LLC since this transfer has not been approved by the COGCC.</p> <p>Please send the corrected documents to me and I will upload them to the Form 9.</p> | 07/12/2022 |
| Financial Assurance | <p>3/9 Email sent</p> <p>I have reviewed the Form 9 Intent, document #402636032, and noted that your Intent Attestation is inadequate. Please review the attached Attestation Guidance and resubmit the attestation to me and I will upload it to the form.</p> <p>Additionally, in accordance with COGCC Rule 218.e.(3), we do not approve a Form 9 Intent on its own; the Form 9 Intent can only be approved in coordination with corresponding Form 9 Subsequent. COGCC Rule 218.d.(1) requires the buyer to submit a Form 9 Subsequent within 7 days of closing of the business transaction. According to the Intent, the transaction was expected to close on 03/21/2021. As of today, the Form 9 Subsequent is 335 days past due and this transfer is not in compliance with COGCC Rules. If the transfer was cancelled, please let me know and I will withdraw the Form 9 Intent. However, if it did occur as scheduled, please submit the Form 9 Subsequent as soon as possible to complete the transfer.</p> | 04/08/2022 |
| Prod/Levy | Review complete, forwarded to Financial Assurance 03/30/2021 | 03/30/2021 |
| Total: 4 comment(s) | | |