

St. Croix Operating, Inc.

P.O. Box 13799
Denver, CO 80201

October 4, 2022

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

Re: Confidential Asset Transfer Attestation
Impetro Resources, LLC., to St. Croix Operating, Inc.
Form 9-Subsequent. Document # 403186278

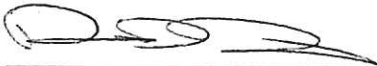
Dear Director Murphy:

In accordance with Rule 218.f Transfer of Operatorship-Subsequent, St. Croix Operating, Inc. (St. Croix), Buying Operator, would like to inform the Colorado Oil and Gas Conservation Commission (COGCC) that it has acquired select assets from Impetro Resources, LLC (Impetro), Selling Operator. The transaction is to be considered confidential and any other associated information confidential pursuant to § 24-72-204(3)(a)(IV), C.R.S. Impetro and St. Croix submit this letter of attestation and associated documents to notify the COGCC of the transfer of assets.

Per Rule 218.a.(1), included as Attachment A is the Transferable Items list associated with this transaction. Both Operators agree to the transfer of operatorship of the attached list of Transferable Items and that the attached list of Transferable Items is complete. St. Croix has financial assurance in place to cover the bonding requirement to acquire these assets to their operatorship per Rule 703. The transfer took place September 27, 2022. St. Croix will be assuming responsibility for all Transferrable Items associated in this transaction. Any Items not transferring in this transaction will remain the liability of Impetro and Impetro will retain compliance with Commission rules.

Selling Operator

Impetro Resources, LLC
558 Castle Pines Pkwy, Unit B-4
Castle Pines, CO 80108
COGCC Operator # 10690



Brent Bongers, President/COO

Buying Operator

St. Croix Operating, Inc.
P.O. Box 13799
Denver, CO 80201
COGCC Operator # 81490



Paul Melnychenko, President

Attachment A Transferable Items
CC: Trisha Fanning, Ardor Environmental LLC