



December 9, 2022

Doc# 1311077

Colorado Oil & Gas Conservation Commission
Attn: Deborah Bracey
1120 Lincoln Street, Suite 801
Denver, CO 80203

RE: Form 9 – Seller Retains Responsibility Attestation – Document #403036983

To Whom It May Concern,

This document will serve as attestation that the seller will retain compliance responsibility for the below list of Related Incidents – Not Transferred as part of Rule 218.d.(1).C.ii regarding the transfer of ownership of oil and gas assets from Phoenix Resources LLC (10691) to GMT Exploration (10243), Document #403036983.

Attachment A lists all related incidents not transferred in this transaction.

Selling Operator

Phoenix Resources LLC
Operator Number: 10691
5566 S. Sycamore St.
Littleton, CO 80120

Buying Operator

Name: GMT Exploration LLC
Operator Number: 10243
1560 Broadway Suite 2000
Denver, CO 80202

I, Taylor Heffner, Partner at Phoenix Resources LLC, agree to the retention of compliance responsibility of the items listed in **Attachment A** from Phoenix Resources to GMT Exploration.

Sign/date: 
Name: Taylor Heffner
Title: Partner

Cordially,
Taylor Heffner
281-460-1517



Attachment A

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	402283895	NOAV	1/14/2020	10691	Phoenix Resources LLC	10691	Phoenix Resources LLC
2	402662232	NOAV	11/23/2021	10691	Phoenix Resources LLC	10691	Phoenix Resources LLC
3	402875193	NOAV	11/18/2021	10691	Phoenix Resources LLC	10691	Phoenix Resources LLC