

From: [Dan Johnson](#)
To: [Deborah Bracey - DNR](#); [Mac Penman](#)
Subject: RE: Form 9 Transfer - Piceance Creek Ranch LTD #403028758 to PiceanceCreek Ranch LLC #403303043
Date: Wednesday, March 22, 2023 9:18:19 AM
Attachments: [image001.png](#)

Hello Deb,

I will accept these conditions of approval. Issue 1 Solution 1, you may move the Intent Attestation.

I am having a problem submitting form 3, in the attachment section it states, CERTIFICATION OF FINANCIAL CAPABILITY attachment is required, am I missing something as this should be Auto populated?

Dan Johnson
(308) 436-0051

From: [Deborah Bracey - DNR](#)
Sent: Tuesday, March 21, 2023 12:26 PM
To: [Mac Penman](#); [Dan Johnson](#)
Subject: Form 9 Transfer - Piceance Creek Ranch LTD #403028758 to PiceanceCreek Ranch LLC #403303043

Mac,

I just took a look at your transfer and noted the following issues.

Issue 1: There was no Intent Attestation submitted with the Intent #403028758.

Solution 1: The Intent Attestation that was submitted with the Subsequent is acceptable. With both operators permission, I will move the Intent Attestation from the Subsequent to Intent.

Issue 2: The Wells and Facilities Transferred Wells and Facilities Proposed spreadsheets were not completed properly and the data will not upload to the form.

Solution 2: If we can get the spreadsheet corrected for the Subsequent, I should be able to process the transfer. Please use the attached template to resubmit the Wells and Facilities Transferred. In column A, please list the numbers sequentially without using the #. Do not add any columns.

Issue 3: The Incidents Proposed and Incidents Transferred spreadsheets were not completed properly and the data will not upload to the form.

Solution 3: If we can get the spreadsheet corrected for the Subsequent, I should be able to process the transfer. Please use the attached template to resubmit the Incidents Transferred. In column A, please list the numbers sequentially without using the #. Do not add any columns.

All revised spreadsheets can be emailed to me to be uploaded to the transfer.

And finally, assuming the other Form 9 requirements are met, all Form 9s shall now be passed with the following two COAs:

The Buying Operator must file a *Form 3, Financial Assurance Plan*, within 10 business days of Form 9 approval. Per Rule 702, Buyer will then provide any required additional financial assurance as soon as practicable but no later than 90 days from the Commission's approval of the *Form 3, Financial Assurance Plan*.

The Selling Operator must file a *Form 3, Financial Assurance Plan* within 10 business days of Form 9 approval. Per Rule 702, Seller will then provide any required additional financial assurance as soon as practicable but no later than 90 days from the Commission's approval of the *Form 3, Financial Assurance Plan*.

Both operators need to respond to this email that they accept the Conditions of Approval.

Please let me know if you have any questions.

Kindly,
Deb

From: Mac Penman <Mac.Penman@andisil.com>
Sent: Tuesday, March 21, 2023 7:31 AM
To: Deborah Bracey - DNR <deborah.bracey@state.co.us>; Dan Johnson <piceanceranch@gmail.com>
Subject: RE: Pit #117127

Deb,

Any update on reviewing our Form 9?

Mac

From: Deborah Bracey - DNR <deborah.bracey@state.co.us>
Sent: Wednesday, February 1, 2023 10:40 AM
To: Mac Penman <Mac.Penman@andisil.com>; Dan Johnson <piceanceranch@gmail.com>
Subject: RE: Pit #117127

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Mac,

Form 9 Transfers are reviewed in the order that they are received. There are several ahead of yours. Once I have had an opportunity to review yours, I will email both parties and let you know if any issues are outstanding.

Kindly,
Deb

From: Mac Penman <Mac.Penman@andisil.com>
Sent: Wednesday, February 1, 2023 9:16 AM
To: Deborah Bracey - DNR <deborah.bracey@state.co.us>; Dan Johnson <piceanceranch@gmail.com>
Subject: RE: Pit #117127

Deb,

Do you have everything you need to review and approve our Form 9?

Mac

From: Deborah Bracey - DNR <deborah.bracey@state.co.us>
Sent: Thursday, January 26, 2023 5:37 PM
To: Dan Johnson <piceanceranch@gmail.com>; Mac Penman <Mac.Penman@andisil.com>
Subject: RE: Pit #117127

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dan,

You can email me the new Intent Attestation and I will upload it to the form. You cannot make changes to a form that has been submitted. The other alternative is that I can return the Intent back to draft. Please let me know how you would like to proceed.

Kindly,
Deb

From: Dan Johnson <piceanceranch@gmail.com>
Sent: Thursday, January 26, 2023 4:32 PM
To: Mac Penman <Mac.Penman@andisil.com>

Cc: deborah.bracey@state.co.us

Subject: RE: Pit #117127

Mac,

It will not let me add the new Intent Letter of Attestation, but it shows the original.

Dan Johnson
(308) 436-0051

From: [Mac Penman](#)

Sent: Thursday, January 26, 2023 3:30 PM

To: [Dan Johnson](#)

Subject: RE: Pit #117127

Dan,

See attached, I included it on my subsequent Form 9 and successfully submitted the form. You need to attached it to your intent Form 9 and submit the form as well.

I hope we are nearing the end of this nightmare!

Mac

From: Dan Johnson <piceanceranch@gmail.com>

Sent: Thursday, January 26, 2023 3:57 PM

To: Mac Penman <Mac.Penman@andisil.com>

Subject: RE: Pit #117127

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello Mac,

Hopefully we are getting some where with this unpleasant process. Please find attached the documents, could you please send me back a copy of the letter of intent after you sign it. Do I need to send it to Deb or will you?

Dan Johnson
(308) 436-0051

From: [Mac Penman](#)

Sent: Thursday, January 26, 2023 12:35 PM

To: [Dan Johnson](#)

Subject: RE: Pit #117127

Dan,

Ok, I think I have it figured out, I needed to start a new form 9 (subsequent), #403303043 and referenced your form 9 (intent) # 403028758.

Please print, sign and scan the subsequent letter of attestation and email back to me. Also – look at page 3 of the attached guidelines, you need to do a new intent letter of attestation.

What a giant pain in the ass.

Mac

From: Dan Johnson <piceanceranch@gmail.com>

Sent: Wednesday, January 25, 2023 7:48 PM
To: Mac Penman <Mac.Penman@andisil.com>
Subject: RE: Pit #117127

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Maybe this will help.



Dan Johnson
(308) 436-0051

From: [Mac Penman](#)
Sent: Wednesday, January 25, 2023 2:44 PM
To: [Dan Johnson](#)
Subject: RE: Pit #117127

Dan,

What is your document number for the intent Form 9 you submitted, 403028758?

Mac

From: Dan Johnson <piceanceranch@gmail.com>
Sent: Monday, January 23, 2023 4:41 PM
To: Mac Penman <Mac.Penman@andisil.com>
Subject: RE: Pit #117127

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Mac,

I resubmitted the intent form, you will have to resubmit the subsequent form.

Congrats on the Lion hunt!

Dan Johnson
(308) 436-0051

From: [Mac Penman](#)
Sent: Monday, January 23, 2023 7:17 AM

To: Piceanceranch@gmail.com

Subject: FW: Pit #117127

Dan – did you have any luck accessing the Form 9?

Had a successful lion hunt with Jake last week.

Hope all is well with you and Cheryl!

Mac

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

Sent: Friday, January 13, 2023 4:43 PM

To: Mac Penman <Mac.Penman@andisil.com>

Cc: Piceanceranch@gmail.com

Subject: RE: Pit #117127

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Mac,

The seller submits the Intent documentation and the Buyer submits the Subsequent Documentation. The transfer is reviewed and then approved after both sets of documents meet the requirements. When approved, the Subsequent is what actually transfers the Wells, Facilities and incidents to the Buyer.

Have a nice weekend!

Deb

From: Mac Penman <Mac.Penman@andisil.com>

Sent: Friday, January 13, 2023 3:28 PM

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

Cc: Piceanceranch@gmail.com

Subject: RE: Pit #117127

Thanks Deb, refresh my memory what is the Subsequent?

Mac

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

Sent: Friday, January 13, 2023 2:35 PM

To: Mac Penman <Mac.Penman@andisil.com>

Cc: Piceanceranch@gmail.com

Subject: RE: Pit #117127

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Mac,

I have return document #403028758 to draft so that you can make changes. The Subsequent will also need to be submitted before the transfer will be reviewed.

Thanks,

Deb

From: Mac Penman <Mac.Penman@andisil.com>

Sent: Thursday, January 12, 2023 10:09 AM

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

Cc: Dan Johnson <piceanceranch@gmail.com>

Subject: RE: Pit #117127

Deb,

We got the pit closed, see attached, last month and want to finish the Form 9 transfer that Dan started last May. When we go into the website and access Form 9 document number 403028758 it is locked.

Can you unlock this document?

Mac

From: Deborah Bracey - DNR <deborah.bracey@state.co.us>
Sent: Monday, May 23, 2022 5:56 PM
To: Mac Penman <Mac.Penman@andisil.com>
Cc: Dan Johnson <piceanceranch@gmail.com>
Subject: RE: Pit #117127

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Mac,

A full review is required per the 900 and 1000 series rules before the pit can be closed. The Rules are located on our website under Regulation, Rules.

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: Mac Penman <Mac.Penman@andisil.com>
Sent: Monday, May 23, 2022 9:53 AM
To: Bracey - DNR, Deborah <deborah.bracey@state.co.us>; Dan Johnson <piceanceranch@gmail.com>
Subject: RE: Pit #117127

Deb,

Dan has no record of soil contamination from when the pit was closed.

Does this mean we have to hire someone to do the testing in order to officially close the pit? If so, do you have testing standards and contamination specifications you can share along with the necessary documentation needed from our side?

Mac

----- Forwarded message -----

From: **Deborah Bracey - DNR** <deborah.bracey@state.co.us>
Date: Tue, May 10, 2022 at 3:00 PM
Subject: Pit #117127
To: Piceance Creek Ranch <piceancecreek ranch@gmail.com>, <macpenman@andisil.com>

Dan and Mac,

Our Environmental department has indicated that the COGCC does not have sufficient information and data available in the record to close the pit. As a result, Dan will either need to provide data collected at the time of the physical closure of the pit or one of you will need to conduct a subsurface investigation to demonstrate that there is no residual E&P Waste or Oily Waste in and around the pit location. Please let me know if you have any questions.

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

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Deborah Bracey
Accountant

Image removed by sender.



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