

From: Tee Austin
To: Deborah Bracey - DNR; Anita Sanford
Cc: jimmy.lozano@chevron.com; mo.montoya@chevron.com; andrewolson@chevron.com; jwebb@progressivepcs.net
Subject: RE: Form 9 Transfer Chevron USA Inc to Scout Energy Management LLC (Multiple Document Numbers)
Date: Thursday, February 9, 2023 7:33:39 AM
Attachments: image001.png
 Chevron #402847277 to Scout #402891430 - Unaccounted for Incidents.xlsx
 Subsequent-WellsFacilitiesTransferred Item 150-299 Doc 402890468.xlsx
 Subsequent-WellsFacilitiesTransferred Item 449-598 Doc 402890493.xlsx
 Subsequent-WellsFacilitiesTransferred Item 599-748 Doc 402890516.xlsx
 Subsequent-WellsFacilitiesTransferred Item 749-898 Doc 402890528.xlsx
 Subsequent-WellsFacilitiesTransferred Item 899-1048 Doc 402891430.xlsx
 Subsequent-WellsFacilitiesTransferred Item 1049-1198 Doc 402891448.xlsx
 Subsequent-WellsFacilitiesTransferred Item 1199-1348 Doc 402891495.xlsx
 Subsequent-WellsFacilitiesTransferred Item 1349-1497 Doc 402891516.xlsx
 Subsequent-WellsFacilitiesTransferred Item 1946-2095 Doc 402891662.xlsx

Good morning Deb,

Please see the attached spreadsheet that Anita has revised.

Scout accepts and will abide by the COA's noted below.

Best,

Tee (Brown) Austin
 Director - Operational Compliance



13800 Montfort Drive, Suite 100 | Dallas, TX 75240*
tbrown@scoutep.com | 972-325-1027

***Please note new address**

From: Deborah Bracey - DNR <deborah.bracey@state.co.us>
Sent: Wednesday, February 8, 2023 6:03 PM
To: Anita Sanford <Anita.Sanford@scoutep.com>
Cc: Tee Austin <Tee.Austin@scoutep.com>; jimmy.lozano@chevron.com; mo.montoya@chevron.com; andrewolson@chevron.com; jwebb@progressivepcs.net
Subject: RE: Form 9 Transfer Chevron USA Inc to Scout Energy Management LLC (Multiple Document Numbers)

All,

Here is where we currently stand. It appears that the Spill or Releases are the issue. They need to be entered correctly on the spreadsheet.

Chevron #40284700 to Scout #402887795

- Location ID #311804 Union Pacific #34-31 Facility ID #444035 **Spill or Release AC - 2/5/2021**
 This is an active Spill or Release and needs to be accounted for. The Facility Type in Column B is Spill or Release with the Facility ID and Location ID in columns E and F respectively.

Chevron #402847248 to Scout #402890468

- There is one Unaccounted For Facility (Location #314373, **EMERALD #4** Facility # 480349 **Emerald 4 Flowline spill - AC 8/2/2021**) that needs to be accounted for. **2021** This is an active Spill or Release and needs to be accounted for. The Facility Type in Column B is Spill or Release with the Facility ID and Location ID in columns E and F respectively.

Chevron #402847267 to Scout #402890493

- There is one Unaccounted For Facility (Location #314622 **FEE #19**, Facility # 448608 **SPILL/RELEASE POINT -AC 4/12/2021**) that needs to be accounted for. The Facility Type in Column B is Spill or Release with the Facility ID and Location ID in columns E and F respectively.

Chevron #402847273 to Scout #402890516

- There is one Unaccounted For Facility (Location #314646 **UNION PACIFIC #22-32** , Facility # 453683 **Spill – AC 2-5-2021**) that needs to be accounted for. The Facility Type in Column B is Spill or Release with the Facility ID and Location ID in columns E and F respectively.

Chevron #402847276 to Scout #402890528

- There is one Unaccounted For Spill or Release (Location #314763 (**M B LARSON #C11 X 25 well P&A 8/24/2021**) **location active open remediation** , Facility # 481149 – **SPILL satellite header 38 bulk line-AC 12/1/2021**) that needs to be accounted for. The Facility Type in Column B is Spill or Release with the Facility ID and Location ID in columns E and F respectively.

Chevron #402847277 to Scout #402891430

- There are two Unaccounted For Facilities that need to be accounted for as follows:
Location ID #314933 Facility ID #438685 Spill or Release
Location ID #314965 Facility ID #480932 Spill or Release
The Facility Type in Column B is Spill or Release with the Facility ID and Location ID in columns E and F respectively.

Chevron #402847282 to Scout #402891448

- There is one Unaccounted For Facility (Location #315324, Facility # 481858) that is a Spill and Release point that needs to be accounted for. The Facility Type in Column B is Spill or Release with the Facility ID and Location ID in columns E and F respectively.

Chevron #402847287 to Scout #402891495

- There is one Unaccounted For Facility (Location #315740, Facility # 447266) that is a Spill and Release point that needs to be accounted for. The Facility Type in Column B is Spill or Release with the Facility ID and Location ID in columns E and F respectively.

Chevron #402847293 to Scout #402891516

- There is one Unaccounted For Facility (Location #316136, Facility # 446036) that is a Spill and Release point that needs to be accounted for. The Facility Type in Column B is Spill or Release with the Facility ID and Location ID in columns E and F respectively.

Chevron #402847328 to Scout #402891662

- There are five Unaccounted For Facilities that need to be accounted for as follows:

Location ID #413288 Facility ID #448925 Spill or Release

Location ID #413288 Facility ID #457749 Spill or Release

Location ID #426403 Facility ID #481872 Flowline System

Location ID #426403 Facility ID #483023 Spill or Release

Location ID #451320 Facility ID #451090 Spill or Release

The Facility Type in Column B is Spill or Release with the Facility ID and Location ID in columns E and F respectively. Instead of Location, Location ID 426403, Facility ID 481872 should have Flowline System as the Facility Type in Column B.

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.

Please note that each operator needs confirm that it will abide by the aforementioned COA by responding to this email. The correspondence will be uploaded to the form.

Please reach out with any questions.

Kindly,
Deb

From: Anita Sanford <Anita.Sanford@scoutep.com>

Sent: Tuesday, February 7, 2023 8:43 AM

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

Cc: Tee Austin <Tee.Austin@scoutep.com>

Subject: RE: Form 9 Transfer Chevron USA Inc to Scout Energy Management LLC (Multiple Document Numbers)

Hi Deb, I just wanted to check with you on the progress of the Form 9 Transfer. Do you require any additional information or do you have any questions?

Best, Anita

From: Anita Sanford

Sent: Thursday, January 12, 2023 10:21 AM

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

Cc: Tee Brown <tbrown@scoutep.com>

Subject: FW: Form 9 Transfer Chevron USA Inc to Scout Energy Management LLC (Multiple Document Numbers)

Hi Deb, Thank you so much for your help to get to this point on this transfer. I have edited the documents and added the one non-transferrable item that is not part of the sale onto a Subsequent-Related Incidents Not Transferred document which I also sent to Chevron for their submission.

Best, Anita Sanford
Regulatory Analyst



Scout Energy Partners

100 Chevron Road, Rangely, CO 81648

Office: 970-551-8313 | Mobile: 970-620-3390

anita.sanford@scoutep.com

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

Sent: Wednesday, November 23, 2022 3:31 PM

To: Anita Sanford <Anita.Sanford@scoutep.com>; Tee Brown <tbrown@scoutep.com>; jimmy.lozano@chevron.com; mo.montoya@chevron.com; andrewolson@chevron.com

Cc: jwebb@progressivepcs.net

Subject: Form 9 Transfer Chevron USA Inc to Scout Energy Management LLC (Multiple Document Numbers)

All,

I am reviewed the transfer again with the following issues noted below.

Chevron #40284700 to Scout #402887795

- Buyer Notified Local Govt. Attestation – Please specify the individual contacted at Rio Blanco County and resubmit the attestation.
- There are two Unaccounted For Facilities that need to be accounted for as follows:

Location ID #311804 Union Pacific #34-31 Facility ID #444035 Spill or Release AC -
2/5/2021

Location ID #314367 EMERALD #25 Facility ID #314367 – should be included in transfer

If these facilities are to be transferred to Scout, then please add these facilities to the Wells and Facilities Transferred list.

If these facilities are to be retained by Chevron, then the facilities need to be added to a Wells Facilities – Not Transferred list. In addition to the list, a Seller retains responsibility

Attestation must be submitted.

- There are 20 unaccounted for incidents related to this transfer. See Attached.

These corrective actions may or may not have been resolved. FIRs with outstanding corrective actions are transferable items that must be accounted for in the Form 9 in one or more of the following ways.

If the compliance responsibility for such an FIR transfers to the buyer include that FIR on a Related Incidents Transferred list.

If the compliance responsibility for such an FIR is retained by the seller include that FIR on a Related Incidents Not Transferred list and provide a Seller Retains Responsibility Attestation.

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.

Chevron #402847248 to Scout #402890468

- Buyer Notified Local Govt. Attestation – Please specify the individual contacted at Rio Blanco County and resubmit the attestation.
- There is one Unaccounted For Facility (Location #314373, **EMERALD #4** Facility # 480349 **Emerald 4 Flowline spill - AC 8/2/2021**) that needs to be accounted for.

If these facilities are to be transferred to Scout, then please add these facilities to the Wells and Facilities Transferred list.

If these facilities are to be retained by Chevron, then the facilities need to be added to a Wells Facilities – Not Transferred list. In addition to the list, a Seller retains responsibility Attestation must be submitted.

- There are 19 unaccounted for incidents related to this transfer. See Attached.

These corrective actions may or may not have been resolved. FIRs with outstanding corrective actions are transferable items that must be accounted for in the Form 9 in one or more of the following ways.

If the compliance responsibility for such an FIR transfers to the buyer include that FIR on a Related Incidents Transferred list.

If the compliance responsibility for such an FIR is retained by the seller include that FIR on a Related Incidents Not Transferred list and provide a Seller Retains Responsibility Attestation.

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.

Chevron #402847259 to Scout #402890487

- Buyer Notified Local Govt. Attestation – Please specify the individual contacted at Rio Blanco County and resubmit the attestation.
- There are 25 unaccounted for incidents related to this transfer. See Attached.

These corrective actions may or may not have been resolved. FIRs with outstanding corrective actions are transferable items that must be accounted for in the Form 9 in one or more of the following ways.

If the compliance responsibility for such an FIR transfers to the buyer include that

FIR on a Related Incidents Transferred list.

If the compliance responsibility for such an FIR is retained by the seller include that FIR on a Related Incidents Not Transferred list and provide a Seller Retains Responsibility Attestation.

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.

Chevron #402847267 to Scout #402890493

- Buyer Notified Local Govt. Attestation – Please specify the individual contacted at Rio Blanco County and resubmit the attestation.
- There is one Unaccounted For Facility (Location #314622 **FEE #19**, Facility # 448608 **SPILL/RELEASE POINT -AC 4/12/2021**) that needs to be accounted for.

If these facilities are to be transferred to Scout, then please add these facilities to the Wells and Facilities Transferred list.

If these facilities are to be retained by Chevron, then the facilities need to be added to a Wells Facilities – Not Transferred list. In addition to the list, a Seller retains responsibility Attestation must be submitted.

- There are 18 unaccounted for incidents related to this transfer. See Attached.
These corrective actions may or may not have been resolved. FIRs with outstanding corrective actions are transferable items that must be accounted for in the Form 9 in one or more of the following ways.

If the compliance responsibility for such an FIR transfers to the buyer include that FIR on a Related Incidents Transferred list.

If the compliance responsibility for such an FIR is retained by the seller include that FIR on a Related Incidents Not Transferred list and provide a Seller Retains Responsibility Attestation.

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.

Chevron #402847273 to Scout #402890516

- Buyer Notified Local Govt. Attestation – Please specify the individual contacted at Rio Blanco County and resubmit the attestation.
- There is one Unaccounted For Facility (Location #314646 **UNION PACIFIC #22-32**, Facility # 453683 **Spill – AC 2-5-2021**) that needs to be accounted for.

If these facilities are to be transferred to Scout, then please add these facilities to the Wells and Facilities Transferred list.

If these facilities are to be retained by Chevron, then the facilities need to be added to a Wells Facilities – Not Transferred list. In addition to the list, a Seller retains responsibility Attestation must be submitted.

- There are 21 unaccounted for incidents related to this transfer. See Attached.
These corrective actions may or may not have been resolved. FIRs with outstanding corrective actions are transferable items that must be accounted for in the Form 9 in one or more of the following ways.

If the compliance responsibility for such an FIR transfers to the buyer include that FIR on a Related Incidents Transferred list.

If the compliance responsibility for such an FIR is retained by the seller include that FIR on a Related Incidents Not Transferred list and provide a Seller Retains Responsibility Attestation.

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.

Chevron #402847276 to Scout #402890528

- Buyer Notified Local Govt. Attestation – Please specify the individual contacted at Rio Blanco County and resubmit the attestation.
- There is one Unaccounted For Spill or Release (Location #314763 (**M B LARSON #C11 X 25 well P&A 8/24/2021**) location active open remediation , Facility # 481149 – **SPILL satellite header 38 bulk line-AC 12/1/2021**) that needs to be accounted for.

If these facilities are to be transferred to Scout, then please add these facilities to the Wells and Facilities Transferred list.

If these facilities are to be retained by Chevron, then the facilities need to be added to a Wells Facilities – Not Transferred list. In addition to the list, a Seller retains responsibility Attestation must be submitted.

- There are 40 unaccounted for incidents related to this transfer. See Attached.
These corrective actions may or may not have been resolved. FIRs with outstanding corrective actions are transferable items that must be accounted for in the Form 9 in one or more of the following ways.

If the compliance responsibility for such an FIR transfers to the buyer include that FIR on a Related Incidents Transferred list.

If the compliance responsibility for such an FIR is retained by the seller include that FIR on a Related Incidents Not Transferred list and provide a Seller Retains Responsibility Attestation.

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.

Chevron #402847277 to Scout #402891430

- Buyer Notified Local Govt. Attestation – Please specify the individual contacted at Rio Blanco County and resubmit the attestation.
- There are two Unaccounted For Facilities that need to be accounted for as follows:

Location ID #314933 Facility ID #438685 Spill or Release

Location ID #314965 Facility ID #480932 Spill or Release

If these facilities are to be transferred to Scout, then please add these facilities to the Wells and Facilities Transferred list.

If these facilities are to be retained by Chevron, then the facilities need to be added to a Wells Facilities – Not Transferred list. In addition to the list, a Seller retains responsibility Attestation must be submitted.

- There are 26 unaccounted for incidents related to this transfer. See Attached.

These corrective actions may or may not have been resolved. FIRs with outstanding corrective actions are transferable items that must be accounted for in the Form 9 in one or more of the following ways.

If the compliance responsibility for such an FIR transfers to the buyer include that FIR on a Related Incidents Transferred list.

If the compliance responsibility for such an FIR is retained by the seller include that FIR on a Related Incidents Not Transferred list and provide a Seller Retains Responsibility Attestation.

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.

Chevron #402847282 to Scout #402891448

- Buyer Notified Local Govt. Attestation – Please specify the individual contacted at Rio Blanco County and resubmit the attestation.
- There is one Unaccounted For Facility (Location #315324, Facility # 481858) that needs to be accounted for.

If these facilities are to be transferred to Scout, then please add these facilities to the Wells and Facilities Transferred list.

If these facilities are to be retained by Chevron, then the facilities need to be added to a Wells Facilities – Not Transferred list. In addition to the list, a Seller retains responsibility Attestation must be submitted.

- There are 29 unaccounted for incidents related to this transfer. See Attached.

These corrective actions may or may not have been resolved. FIRs with outstanding corrective actions are transferable items that must be accounted for in the Form 9 in one or more of the following ways.

If the compliance responsibility for such an FIR transfers to the buyer include that FIR on a Related Incidents Transferred list.

If the compliance responsibility for such an FIR is retained by the seller include that FIR on a Related Incidents Not Transferred list and provide a Seller Retains Responsibility Attestation.

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.

Chevron #402847287 to Scout #402891495

- Buyer Notified Local Govt. Attestation – Please specify the individual contacted at Rio Blanco County and resubmit the attestation.
- There is one Unaccounted For Facility (Location #315740, Facility # 447266) that needs to be accounted for.

If these facilities are to be transferred to Scout, then please add these facilities to the Wells and Facilities Transferred list.

If these facilities are to be retained by Chevron, then the facilities need to be added to a Wells Facilities – Not Transferred list. In addition to the list, a Seller retains responsibility Attestation must be submitted.

- There are 25 unaccounted for incidents related to this transfer. See Attached.

These corrective actions may or may not have been resolved. FIRs with outstanding corrective actions are transferable items that must be accounted for in the Form 9 in one or more of the following ways.

If the compliance responsibility for such an FIR transfers to the buyer include that FIR on a Related Incidents Transferred list.

If the compliance responsibility for such an FIR is retained by the seller include that FIR on a Related Incidents Not Transferred list and provide a Seller Retains Responsibility Attestation.

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.

Chevron #402847293 to Scout #402891516

- Buyer Notified Local Govt. Attestation – Please specify the individual contacted at Rio Blanco County and resubmit the attestation.
- There is one Unaccounted For Facility (Location #316136, Facility # 446036) that needs to be accounted for.

If these facilities are to be transferred to Scout, then please add these facilities to the Wells and Facilities Transferred list.

If these facilities are to be retained by Chevron, then the facilities need to be added to a Wells Facilities – Not Transferred list. In addition to the list, a Seller retains responsibility Attestation must be submitted.

- There are 28 unaccounted for incidents related to this transfer. See Attached.

These corrective actions may or may not have been resolved. FIRs with outstanding corrective actions are transferable items that must be accounted for in the Form 9 in one or more of the following ways.

If the compliance responsibility for such an FIR transfers to the buyer include that FIR on a Related Incidents Transferred list.

If the compliance responsibility for such an FIR is retained by the seller include that FIR on a Related Incidents Not Transferred list and provide a Seller Retains Responsibility Attestation.

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.

Chevron #402847295 to Scout #402891587

- Buyer Notified Local Govt. Attestation – Please specify the individual contacted at Rio Blanco County and resubmit the attestation.
- There are 26 unaccounted for incidents related to this transfer. See Attached.

These corrective actions may or may not have been resolved. FIRs with outstanding corrective actions are transferable items that must be accounted for in the Form 9 in one or more of the following ways.

If the compliance responsibility for such an FIR transfers to the buyer include that FIR on a Related Incidents Transferred list.

If the compliance responsibility for such an FIR is retained by the seller include that FIR on a Related Incidents Not Transferred list and provide a Seller Retains Responsibility Attestation.

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.

Chevron #402847312 to Scout #402891604

- Buyer Notified Local Govt. Attestation – Please specify the individual contacted at Rio Blanco County and resubmit the attestation.
- There are 6 unaccounted for incidents related to this transfer. See Attached.

These corrective actions may or may not have been resolved. FIRs with outstanding corrective actions are transferable items that must be accounted for in the Form 9 in one or more of the following ways.

If the compliance responsibility for such an FIR transfers to the buyer include that FIR on a Related Incidents Transferred list.

If the compliance responsibility for such an FIR is retained by the seller include that FIR on a Related Incidents Not Transferred list and provide a Seller Retains Responsibility Attestation.

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.

Chevron #402847322 to Scout #402891631

- Buyer Notified Local Govt. Attestation – Please specify the individual contacted at Rio Blanco County and resubmit the attestation.
- There are 7 unaccounted for incidents related to this transfer. See Attached.

These corrective actions may or may not have been resolved. FIRs with outstanding corrective actions are transferable items that must be accounted for in the Form 9 in one or more of the following ways.

If the compliance responsibility for such an FIR transfers to the buyer include that FIR on a Related Incidents Transferred list.

If the compliance responsibility for such an FIR is retained by the seller include that FIR on a Related Incidents Not Transferred list and provide a Seller Retains Responsibility Attestation.

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.

Chevron #402847328 to Scout #402891662

- Buyer Notified Local Govt. Attestation – Please specify the individual contacted at Rio Blanco County and resubmit the attestation.
- There are five Unaccounted For Facilities that need to be accounted for as follows:
 - Location ID #413288 Facility ID #448925 Spill or Release
 - Location ID #413288 Facility ID #457749 Spill or Release

Location ID #426403 Facility ID #481872 Flowline System

Location ID #426403 Facility ID #483023 Spill or Release

Location ID #451320 Facility ID #451090 Spill or Release

If these facilities are to be transferred to Scout, then please add these facilities to the Wells and Facilities Transferred list.

If these facilities are to be retained by Chevron, then the facilities need to be added to a Wells Facilities – Not Transferred list. In addition to the list, a Seller retains responsibility Attestation must be submitted.

- There are 19 unaccounted for incidents related to this transfer. See Attached.

These corrective actions may or may not have been resolved. FIRs with outstanding corrective actions are transferable items that must be accounted for in the Form 9 in one or more of the following ways.

If the compliance responsibility for such an FIR transfers to the buyer include that FIR on a Related Incidents Transferred list.

If the compliance responsibility for such an FIR is retained by the seller include that FIR on a Related Incidents Not Transferred list and provide a Seller Retains Responsibility Attestation.

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.

Chevron #402847336 to Scout #402891690

- Buyer Notified Local Govt. Attestation – Please specify the individual contacted at Rio Blanco County and resubmit the attestation.

Chevron #402847928 to Scout #402891710

- Buyer Notified Local Govt. Attestation – Please specify the individual contacted at Rio Blanco County and resubmit the attestation.

Chevron #402847952 to Scout #402891752

- Buyer Notified Local Govt. Attestation – Please specify the individual contacted at Rio Blanco County and resubmit the attestation.

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.

Please note that each operator needs confirm that it will abide by the aforementioned COA by responding to this email. The correspondence will be uploaded to the form.

If the operators have submitted a Form 3, please provide the following comment when submitting the revised Form 3.

Form 3 Document #_____ is submitted as a result of an approved Form 9 Transfer of Operatorship and it replaces Form 3 document # _____.

Please reach out with any questions.

Thanks,
Deb