

Subject: RE: Form 9 Transfer - Maralex Resources Inc. #403117698 to Vision Energy LLC #403278005



amo@maralexinc.com
to deborah.bracey, Trish Harrison

Tue, May 2, 10:09 AM (7 days ago)

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Dear Deborah,

Per your request below, as President/CEO of Maralex Resources, Inc. and CEO of Vision Energy, LLC, I am writing to let you know that we are happy to get the final transfers completed to Vision Energy from Maralex Resources, Inc., of all the remaining properties that were supposed to be transferred effective as of January 1, 2020. This entails transferring responsibilities from Maralex to Vision and Vision accepts those responsibilities. Although we believe the remaining properties are all on federal lands and leases and are covered by our BLM bonds, if there are any that are not, Vision will make sure that its bonds includes those wells and facilities. We further believe that at least two of the properties were already abandoned by Maralex years ago and should have been closed out long before a transfer of these properties was made. However, even those we are happy to have Vision close out with the COGCC and the BLM, if necessary.

Please feel free to let me know if you have any questions or additional requirements to complete these transfers.

Kind regards,
A. M. (Mickey) O'Hare, P.E.
President/CEO
Maralex Resources, Inc.
CEO
Vision Energy, LLC

From: Trish Harrison <trishharrison@eis-llc.com>

Sent: Tuesday, May 02, 2023 9:28 AM

To: amo@maralexinc.com

Subject: FW: Form 9 Transfer - Maralex Resources Inc. #403117698 to Vision Energy LLC #403278005

Have a great day!

Trish Harrison

Permitting Specialist

970-759-9545

EIS, Environmental & Permitting Solutions

on behalf of

Maralex Resources, Inc

Vision Energy, LLC

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

Sent: Monday, May 1, 2023 4:52 PM

To: Trish Harrison <trishharrison@eis-llc.com>

Subject: RE: Form 9 Transfer - Maralex Resources Inc. #403117698 to Vision Energy LLC #403278005

Trish,

I failed to mention previously that leases are not transferrable items. Please remove the leases from the Wells and Facilities Transferred List and resubmit the list by emailing it to me. I will need an email from an officer, that they are accepting the COAs for both companies.

Thanks,

Deb

From: Trish Harrison <trishharrison@eis-llc.com>

Sent: Monday, May 1, 2023 4:43 PM

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

Subject: RE: Form 9 Transfer - Maralex Resources Inc. #403117698 to Vision Energy LLC #403278005

Hi Deb...

Thanks for your response. I was on the phone when you called.

Attached you will find the Intent and Subsequent Attestations.

I am currently working on the Financial Assurance requirements. I believe all these assets are federal and were included in the review last year of Vision's Federal Financial Assurance, so probably won't affect the amount of the required COGCC Financial Assurance. But once the transfers have been approved, we will re-work the Form 3 and re-submit if needed.

thanks

Have a great day!

Trish Harrison

Permitting Specialist

970-759-9545

EIS, Environmental & Permitting Solutions

on behalf of

Maralex Resources, Inc

Vision Energy, LLC

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

Sent: Monday, May 1, 2023 3:56 PM

To: Trish Harrison <trishharrison@eis-llc.com>

Subject: RE: Form 9 Transfer - Maralex Resources Inc. #403117698 to Vision Energy LLC #403278005

Trish,

I tried to call you this afternoon to discuss the issues below.

Issue 1: The Form 9 Intent references an incorrect document number. **Please submit the Intent Attestation referencing the Intent document number.**

Solution 1: Attached.

Issue 2: The Subsequent Attestation does not reference the Subsequent document number. **Please submit the Subsequent Attestation referencing the Subsequent document number.**

Solution 2: Attached.

Issue 3: The Buyer Notified Local Govt. Attestation only indicates that Kirby Wynn of Garfield county was notified. The transfer involves wells and facilities located in two other Counties, Mesa and Rio Blanco.

Solution 3: All three counties were notified when the initial transfer happened. Do you need me to re-do these attestations to reflect the updated document numbers? **No. On the original submittal, there was only the Buyer Notified Local Govt. Attestation for Garfield County. I will have the other two uploaded to the form. Resolved**

Issue 4: There are several Related and Unaccounted for Incidents that will need to be accounted for.

Solution 4: Attached. **Resolved.**

I will also need both operators to accept the COAs by emailing their acceptance to me.

Thanks,
Deb

From: Trish Harrison <trishharrison@eis-llc.com>

Sent: Monday, May 1, 2023 12:57 PM

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

Subject: RE: Form 9 Transfer - Maralex Resources Inc. #403117698 to Vision Energy LLC #403278005

Deb –

Issue 1: The Form 9 Intent references an incorrect document number.

Solution 1: Attached.

Issue 2: The Subsequent Attestation does not reference the Subsequent document number.

Solution 2: Attached.

Issue 3: The Buyer Notified Local Govt. Attestation only indicates that Kirby Wynn of Garfield county was notified. The transfer involves wells and facilities located in two other Counties, Mesa and Rio Blanco.

Solution 3: All three counties were notified when the initial transfer happened. Do you need me to re-do these attestations to reflect the updated document numbers?

Issue 4: There are several Related and Unaccounted for Incidents that will need to be accounted for.

Solution 4: Attached.

thanks

Have a great day!

Trish Harrison

Permitting Specialist

970-759-9545

EIS, Environmental & Permitting Solutions

on behalf of

Maralex Resources, Inc

Vision Energy, LLC

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

Sent: Monday, April 17, 2023 5:54 PM

To: Trish Harrison <trishharrison@eis-llc.com>

Cc: amo@maralexinc.com; mollieo@maralexinc.com

Subject: Form 9 Transfer - Maralex Resources Inc. #403117698 to Vision Energy LLC #403278005

Good Evening Trish,

I have reviewed the above captioned Form 9 transfer and have noted the following issues.

Issue 1: The Form 9 Intent references an incorrect document number.

Solution 1: Please correct the Form 9 Intent Attestation and resubmit the attestation by emailing me the revision.

Issue 2: The Subsequent Attestation does not reference the Subsequent document number.

Solution 2: Please correct the Form 9 Subsequent Attestation and resubmit the attestation by emailing me the revision.

Issue 3: The Buyer Notified Local Govt. Attestation only indicates that Kirby Wynn of Garfield county was notified. The transfer involves wells and facilities located in two other Counties, Mesa and Rio Blanco.

Solution 3: Please submit Buyer Notified Local Govt. Attestations indicating the representatives in Mesa and Rio Blanco counties were notified.

Issue 4: There are several Related and Unaccounted for Incidents that will need to be accounted for.

Solution 4: Create and Incidents Transferred list for the incidents with the current operator listed as Maralex Resources. If the incidents are not to be transferred to Vision Energy, then a Related Incidents – Not Transferred list needs to be submitted. If the incidents are not transferred, then a Seller Retains Responsibility Attestation is required.

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*.

When resubmitting the Form 3, please use the following comment to reference the Form 3 previously submitted.

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

Since this transfer involves Federal wells, a Form 1B will be required after the approval of the transfer.

If you have any questions, please reach out.

Kindly,

Deb