

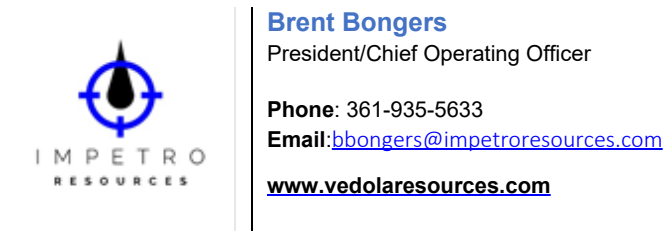
**From:** [Brent Bongers](#)  
**To:** [Deborah Bracey - DNR](#)  
**Cc:** [Amber Barnett](#)  
**Subject:** RE: Form 9 Transfer- Ward & Son\* Alfred #403380195 to Impetro Resources LLC #403457189  
**Date:** Thursday, August 10, 2023 10:45:10 PM  
**Attachments:** [image001.png](#)

---

Hi Deb,

Impetro accepts the two COAs for Form 9S Doc#403457189

Brent



---

**From:** Deborah Bracey - DNR <[deborah.bracey@state.co.us](mailto:deborah.bracey@state.co.us)>  
**Sent:** Thursday, August 10, 2023 3:27 PM  
**To:** [abarnett@ardorenvironmental.com](mailto:abarnett@ardorenvironmental.com); Brent Bongers <[bbongers@impetroresources.com](mailto:bbongers@impetroresources.com)>  
**Cc:** [ellen54ward@gmail.com](mailto:ellen54ward@gmail.com); Blackmon - DNR, Matthew <[matthew.blackmon@state.co.us](mailto:matthew.blackmon@state.co.us)>  
**Subject:** RE: Form 9 Transfer- Ward & Son\* Alfred #403380195 to Impetro Resources LLC #403457189

Thanks Ellen and Amber. The only item that I am waiting on now is the acceptance of the COAs from Impetro Resources. Once I have Impetro's acceptance of the COAs, I will clean up the transfer files and ready them for approval.

Kindly,  
Deb

---

**From:** [abarnett@ardorenvironmental.com](mailto:abarnett@ardorenvironmental.com) <[abarnett@ardorenvironmental.com](mailto:abarnett@ardorenvironmental.com)>  
**Sent:** Thursday, August 10, 2023 2:52 PM  
**To:** 'Deborah Bracey - DNR' <[deborah.bracey@state.co.us](mailto:deborah.bracey@state.co.us)>  
**Subject:** FW: Form 9 Transfer- Ward & Son\* Alfred #403380195 to Impetro Resources LLC #403457189

Hi Deb,

I wanted to forward Ellen's response just in case she hadn't sent it to you directly.

Thank you,

Amber Barnett  
Compliance Specialist  
720.206.9701  
[abarnett@ardorenmvironmental.com](mailto:abarnett@ardorenmvironmental.com)



---

**From:** Ellen Ward <[ellen54ward@gmail.com](mailto:ellen54ward@gmail.com)>  
**Sent:** Thursday, August 10, 2023 2:41 PM  
**To:** [abarnett@ardorenmvironmental.com](mailto:abarnett@ardorenmvironmental.com)  
**Subject:** Re: Form 9 Transfer- Ward & Son\* Alfred #403380195 to Impetro Resources LLC #403457189

Yes this is approved by me, Ellen Ward

On Fri, Aug 4, 2023 at 7:44 PM Ellen Ward <[ellen54ward@gmail.com](mailto:ellen54ward@gmail.com)> wrote:

Is there something i should be doing?Ellen

On Fri, Aug 4, 2023 at 5:40 PM <[abarnett@ardorenmvironmental.com](mailto:abarnett@ardorenmvironmental.com)> wrote:

Thank you for the update, Deb.

Hope you have a great weekend as well.

Amber Barnett  
Compliance Specialist  
720.206.9701  
[abarnett@ardorenmvironmental.com](mailto:abarnett@ardorenmvironmental.com)



---

**From:** Deborah Bracey - DNR <[deborah.bracey@state.co.us](mailto:deborah.bracey@state.co.us)>  
**Sent:** Friday, August 4, 2023 4:55 PM  
**To:** [abarnett@ardorenmvironmental.com](mailto:abarnett@ardorenmvironmental.com)

**Cc:** Trisha Fanning <[tfanning@ardorenvironmental.com](mailto:tfanning@ardorenvironmental.com)>; [bbongers@impetroresources.com](mailto:bbongers@impetroresources.com); [ellen54ward@gmail.com](mailto:ellen54ward@gmail.com); Jessica Donahue <[jdonahue@ardorenvironmental.com](mailto:jdonahue@ardorenvironmental.com)>

**Subject:** RE: Form 9 Transfer- Ward & Son\* Alfred #403380195 to Impetro Resources LLC #403457189

Hi Amber,

I have uploaded all of the new spreadsheets to the Intent and Subsequent. The new spreadsheets have cleared the Unaccounted for items. I will need both operators to email me their acceptance of the COAs.

Have a nice weekend!

Deb

---

**From:** [abarnett@ardorenvironmental.com](mailto:abarnett@ardorenvironmental.com) <[abarnett@ardorenvironmental.com](mailto:abarnett@ardorenvironmental.com)>

**Sent:** Thursday, August 3, 2023 3:04 PM

**To:** 'Deborah Bracey - DNR' <[deborah.bracey@state.co.us](mailto:deborah.bracey@state.co.us)>

**Cc:** 'Trisha Fanning' <[tfanning@ardorenvironmental.com](mailto:tfanning@ardorenvironmental.com)>; [bbongers@impetroresources.com](mailto:bbongers@impetroresources.com); [ellen54ward@gmail.com](mailto:ellen54ward@gmail.com); 'Jessica Donahue' <[jdonahue@ardorenvironmental.com](mailto:jdonahue@ardorenvironmental.com)>

**Subject:** RE: Form 9 Transfer- Ward & Son\* Alfred #403380195 to Impetro Resources LLC #403457189

Deb,

Attached are the updated Intent/Subsequent Facilities Transferred along with the Intent/Subsequent Incidents Transferred. The incidents that can be closed are included in the Incidents to be transferred. We will work on getting those and the additional items closed once the transfer is complete.

Please let me know if you have any questions or need more information.

Thank you,

Amber Barnett  
Compliance Specialist  
720.206.9701  
[abarnett@ardorenvironmental.com](mailto:abarnett@ardorenvironmental.com)



---

**From:** Deborah Bracey - DNR <[deborah.bracey@state.co.us](mailto:deborah.bracey@state.co.us)>

**Sent:** Thursday, August 3, 2023 11:43 AM

**To:** [abarnett@ardorenvironmental.com](mailto:abarnett@ardorenvironmental.com)

**Cc:** Trisha Fanning <[tfanning@ardorenvironmental.com](mailto:tfanning@ardorenvironmental.com)>; [bbongers@impetroresources.com](mailto:bbongers@impetroresources.com); [ellen54ward@gmail.com](mailto:ellen54ward@gmail.com); Jessica Donahue <[jdonahue@ardorenvironmental.com](mailto:jdonahue@ardorenvironmental.com)>

**Subject:** RE: Form 9 Transfer- Ward & Son\* Alfred #403380195 to Impetro Resources LLC #403457189

Amber,

I can return both the Intent or the Subsequent to draft or you can email me the updated documents.

For the incidents that are not transferred, please complete the Incidents Not Proposed for Transfer (Intent), Incidents Not Transferred and a Seller Retains Responsibility Attestation. I have attached templates for the spreadsheets. Again, you can send me all documents and I can get them uploaded to the transfer or I can return the forms to draft.

Please let me know your preference.

Thanks,  
Deb

---

**From:** [abarnett@ardorenvironmental.com](mailto:abarnett@ardorenvironmental.com) <[abarnett@ardorenvironmental.com](mailto:abarnett@ardorenvironmental.com)>

**Sent:** Thursday, August 3, 2023 10:02 AM

**To:** [deborah.bracey@state.co.us](mailto:deborah.bracey@state.co.us)

**Cc:** 'Trisha Fanning' <[tfanning@ardorenvironmental.com](mailto:tfanning@ardorenvironmental.com)>; [bbongers@impetroresources.com](mailto:bbongers@impetroresources.com); [ellen54ward@gmail.com](mailto:ellen54ward@gmail.com); 'Jessica Donahue' <[jdonahue@ardorenvironmental.com](mailto:jdonahue@ardorenvironmental.com)>

**Subject:** FW: Form 9 Transfer- Ward & Son\* Alfred #403380195 to Impetro Resources LLC #403457189

Good morning Deb,

I am assisting with the Form 9 Transfer for Al Ward & Son to Impetro Resources. After researching the unresolved items, and updating the Proposed Locations and Facilities, we are ready to resubmit the Form 9's. I do see that that these documents are still In Process. Would you be able to return those to draft so I can update them?

During my research for the unresolved items, I was able to determine that some of the FIR's and Remediation items should have been closed. These will not be included in the Proposed/Subsequent Incidents Transferred. Would you like me to provide a list of the ones we will be closing under Al Ward?

Please let me know how you would like us to proceed.

Amber Barnett  
Compliance Specialist

720.206.9701

[abarnett@ardorenvironmental.com](mailto:abarnett@ardorenvironmental.com)



---

**From:** Trisha Fanning <[tfanning@ardorenvironmental.com](mailto:tfanning@ardorenvironmental.com)>

**Sent:** Friday, July 14, 2023 5:25 PM

**To:** Christopher McGowne <[cjmcgowne@mcgownelaw.com](mailto:cjmcgowne@mcgownelaw.com)>; Jessica Donahue <[jdonahue@ardorenvironmental.com](mailto:jdonahue@ardorenvironmental.com)>; Amber Barnett <[abarnett@ardorenvironmental.com](mailto:abarnett@ardorenvironmental.com)>

**Subject:** Fwd: Form 9 Transfer- Ward & Son\* Alfred #403380195 to Impetro Resources LLC #403457189

FYI

Trisha J Fanning  
President



(303) 503-7539

[tfanning@ardorenvironmental.com](mailto:tfanning@ardorenvironmental.com)

**CONFIDENTIALITY NOTICE:** The contents of this email message and any attachments are intended solely for the addressee(s) and may contain confidential and/or privileged information and may be legally protected from disclosure. If you have received this message in error please delete.

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

From: **Brent Bongers** <[bbongers@impetroresources.com](mailto:bbongers@impetroresources.com)>

Date: Fri, Jul 14, 2023 at 5:22 PM

Subject: Fwd: Form 9 Transfer- Ward & Son\* Alfred #403380195 to Impetro Resources LLC #403457189

To: Jessica Donahue <[jdonahue@ardorenvironmental.com](mailto:jdonahue@ardorenvironmental.com)>, Trisha Fanning

<tfanning@ardorenvironmental.com>

Sent from my iPhone

Begin forwarded message:

**From:** Deborah Bracey - DNR <[deborah.bracey@state.co.us](mailto:deborah.bracey@state.co.us)>  
**Date:** July 14, 2023 at 5:17:31 PM MDT  
**To:** [ellen54ward@gmail.com](mailto:ellen54ward@gmail.com), Brent Bongers <[bbongers@impetroresources.com](mailto:bbongers@impetroresources.com)>  
**Subject:** Form 9 Transfer- Ward & Son\* Alfred #403380195 to Impetro Resources LLC #403457189

Good afternoon Ellen and Brent,

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

**Issue 1** – There is a lease listed on both the Wells and Facilities Proposed and the Wells and Facilities Transferred lists.

**Solution 1** – Please remove the lease from both lists and resubmit the spreadsheets by emailing them to me. I will get them uploaded to the transfer.

**Issue 2** - After reviewing the status of the Form 9, we've identified 120 Field Inspections Reports (FIR) that were issued with corrective actions related to wells and facilities being transferred (See Attached List). These corrective actions may or may not have been resolved.

**Solution 2** - 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.

1. If the compliance responsibility for such an FIR transfers to the buyer include that FIR on a Related Incidents Transferred list.
2. 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.

**Issue 3** – On the same list as mentioned in Issue 2, there are 10 Open Remediation Projects.

**Solution 3** – Open Remediation Projects are transferable items that must be accounted for in the Form 9 in one or more of the following ways.

1. If the compliance responsibility for the Open Remediation Project transfers to the buyer include that Open Remediation Project on a Related Incidents Transferred list.
2. If the compliance responsibility for the Open Remediation Project is retained by the seller include that Open Remediation Project on a Related Incidents Not Transferred list and provide a Seller Retains Responsibility Attestation.

**Issue 4** - On the same list as mentioned in Issue 2, there are 2 NOAVs.

**Solution 4** - – NOAVs are transferable items that must be accounted for in the Form 9 in one or more of the following ways.

1. If the compliance responsibility for the NOAVs transfers to the buyer include that Open Remediation Project on a Related Incidents Transferred list.
2. If the compliance responsibility for the NOAVs is retained by the seller include that Open Remediation Project on a Related Incidents Not Transferred list and provide a Seller Retains Responsibility Attestation.

**Issue 5** - On the same list as mentioned in Issue 2, there is on Unresolved Spill/Release.

**Solution 5** – Unresolved Spill/Release is a transferable item that must be accounted for in the Form 9 in one or more of the following ways.

1. If the compliance responsibility for the Spill/Release transfers to the buyer include that Open Remediation Project on a Related Incidents Transferred list.
2. If the compliance responsibility for the Spill/Release is retained by the seller include that Open Remediation Project on a Related Incidents Not Transferred list and provide a Seller Retains Responsibility 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 respond with your acceptance to this email stream.

When resubmitting your Form 3, please use the following verbiage.

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

Reach out with any questions.

Kindly,  
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](mailto:deborah.bracey@state.co.us) | [www.colorado.gov/ecmc](http://www.colorado.gov/ecmc)