

August 6, 2024

Ms. Julie Murphy  
Director  
Energy & Carbon Management Commission  
1120 Lincoln, Ste 801  
Denver, CO 80203

Re: Confidential Asset Transfer Attestation  
Poncho Production Company to Impetro Resources LLC  
Form 9-Intent, Document # 403877099

Dear Director Murphy:

In accordance with Rule 218.b.(1-7) Transfer of Operatorship Intent, Poncho Production Company (Poncho), Selling Operator, would like to inform the Energy & Carbon Management Commission (ECMC) that Poncho will be transferring select assets to Buying Operator, Impetro Resources LLC (Impetro). The transaction is to be considered confidential and any other associated information confidential pursuant to § 24-72-204(3)(a)(IV), C.R.S. Poncho and Impetro submit this letter of attestation and associated documents to notify the ECMC of the transfer of assets.

Per Rule 218.a.(1), included as Attachment A is the Transferable Items list associated with this transaction. Both Operators agree to the transfer of operatorship of the attached list of Transferable Items and that the attached list of Transferable Items is complete. Impetro has financial assurance in place to cover the bonding requirement to acquire these assets to their operatorship per Rule 702. The transfer is anticipated to take place September 1, 2024. Impetro will be assuming responsibility for all Transferrable Items associated in this transaction. Any Items not transferring in this transaction will remain the liability of Poncho and Poncho will retain compliance with Commission rules.

**Selling Operator**

Poncho Production Company  
5299 DTC Blvd #1300  
Greenwood Village, CO 80111  
ECMC Operator # 71450



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Carl Dean, Registered Agent

**Buying Operator**

Impetro Resources, LLC  
558 Castle Pines Pkwy, Unit B-4  
Castle Pines, CO 80108  
ECMC Operator # 10690



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Brent Bongers, President/COO

Attachment A Transferable Items  
CC: Trisha Fanning, Ardor Environmental LLC

**ATTACHMENT A****Transferrable Items**

<b>Facility Type</b>	<b>API # / Facility #</b>	<b>Facility Name</b>	<b>Qtr Qtr</b>	<b>Section</b>	<b>Township</b>	<b>Range</b>	<b>County</b>
LEASE	49560	EBENDORF	NWSW	30	1N	54W	WASHINGTON
PIT	117807	EBENDORF	NWSW	30	1N	54W	WASHINGTON
WELL	121-09173	EBENDORFF #1	NWSW	30	1N	54W	WASHINGTON
LOCATION	317133	EBENDORFF-61N54W #30NWSW	NWSW	30	1N	54W	WASHINGTON
OFF-LOCATION FLOWLINE	477104	Ebendorf flowline	NWSW	30	1N	54W	WASHINGTON
LEASE	53162	JOLLY 'D' #'S 1 & 3/	CNW	8	3S	55W	WASHINGTON
PIT	117777	JOLLY "D" 1	SEnw	8	3S	55W	WASHINGTON
WELL	121-05672	JOLLY #D-1	SEnw	8	3S	55W	WASHINGTON
LOCATION	316972	JOLLY-63S55W #8SEnw	SEnw	8	3S	55W	WASHINGTON
PIT	119501	JOLLY "D"	SWNW	8	3S	55W	WASHINGTON