

From: [Jessica Donahue](#)
To: [Bracey - DNR, Deborah](#)
Subject: RE: Form 9 Transfer - Schneider Energy Services Inc. #402880078 to Helena Resources Inc. #402959885
Date: Monday, April 25, 2022 4:54:28 PM
Attachments: [Ruby 2 Related Incidents - 4 8 2022 \(1\).xlsx](#)
[Ruby 2 Subsequent-WellsFacilitiesTransferred.2022April19.xlsx](#)
[0728C65486AE4518BA430A21DFD3B360.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)

Hi Deb,

Please find attached an updated Subsequent transfer spreadsheet; I spoke with Schneider Energy and Helena Resources to confirm their consent with the addition of the new Facility ID.

Also, please find attached a list of the related Inspections with comments. Several of them are closed; a Form 42 or FIRR has been filed. Schneider did perform all the Corrective Actions listed in the inspections.

Let me know if you have any questions.

Jessica

Jessica Donahue
Compliance and Permitting Specialist
Ardor Environmental
<https://www.ardorenvironmental.com/>
(303) 888-4862

From: [Bracey - DNR, Deborah](#)
Sent: Friday, April 22, 2022 1:56 PM
To: [Jessica Donahue](#)
Subject: Re: Form 9 Transfer - Schneider Energy Services Inc. #402880078 to Helena Resources Inc. #402959885

Jessica,

Just wanted to see where you are on this. As well as the 9 related incidents.

Deb

On Tue, Apr 19, 2022 at 10:26 AM Bracey - DNR, Deborah <deborah.bracey@state.co.us> wrote:

Jessica,

A new Facility ID has been assigned to Ruby Tank Battery. The new Facility ID is 481999 and the Location ID is 415301. You should now be able to add it to the Wells and Facilities Transferred list or

the Wells and Facilities Not Transferred List. As mentioned before if Schneider is not transferring the tank battery then a Seller's Retains Responsibility Attestation will be required.

Please let me know if you have any questions.

Thanks,
Deb

On Fri, Apr 15, 2022 at 6:46 AM <jdonahue@ardorenvironmental.com> wrote:

Good morning Deb,

Schneider Energy's representative estimates the removal occurred between April and June 2017.

Let me know if you need anything else.

Jessica

Jessica Donahue
Compliance Specialist
(303) 888-4862



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

Sent: Thursday, April 14, 2022 6:26 PM

To: jdonahue@ardorenvironmental.com

Subject: RE: Form 9 Transfer - Schneider Energy Services Inc. #402880078 to Helena Resources Inc. #402959885

Thanks Jessica.

Deborah Bracey
Accountant



COLORADO
Oil & Gas Conservation
Commission
Department of Natural Resources

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From: jdonahue@ardorenvironmental.com <jdonahue@ardorenvironmental.com>
Sent: Thursday, April 14, 2022 6:24 PM
To: 'Deborah Bracey - DNR' <deborah.bracey@state.co.us>
Subject: RE: Form 9 Transfer - Schneider Energy Services Inc. #402880078 to Helena Resources Inc. #402959885

Hi Deb,

I should have that for you tomorrow. Mr. Schneider is checking with a field employee who was involved at the time the tanks were removed.

Jessica

Jessica Donahue
Compliance Specialist
(303) 888-4862



From: Deborah Bracey - DNR <deborah.bracey@state.co.us>
Sent: Thursday, April 14, 2022 6:18 PM
To: jdonahue@ardorenvironmental.com
Subject: RE: Form 9 Transfer - Schneider Energy Services Inc. #402880078 to Helena Resources Inc. #402959885

Hi Jessica,

Just checking in to see if you were able to get the date narrowed down a bit on the tank battery.

Deb

Deborah Bracey
Accountant



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From: jdonahue@ardorenvironmental.com <jdonahue@ardorenvironmental.com>

Sent: Friday, April 8, 2022 4:51 PM

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

Subject: RE: Form 9 Transfer - Schneider Energy Services Inc. #402880078 to Helena Resources Inc. #402959885

Ok.

From the aerials, it looks like the Mendell tanks were removed between October 2015 and June 2017, but I am seeing if Schneider can narrow that down a bit.

Jessica Donahue
Compliance Specialist
(303) 888-4862



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

Sent: Friday, April 8, 2022 4:46 PM

To: Jessica Donahue <jdonahue@ardorenvironmental.com>

Subject: Re: Form 9 Transfer - Schneider Energy Services Inc. #402880078 to Helena Resources Inc. #402959885

No, it's part of the documentation. The new facility ID will be a Schneider facility and will need to include it in the transfer.

On Fri, Apr 8, 2022 at 4:41 PM <jdonahue@ardorenvironmental.com> wrote:

I have to check on that and I will let you know.

Would it be better to remove the related-not transferring list since none of the related items are Schneider assets?

Jessica Donahue
Compliance Specialist
(303) 888-4862



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

Sent: Friday, April 8, 2022 4:39 PM

To: Jessica Donahue <jdonahue@ardorenvironmental.com>

Subject: Re: Form 9 Transfer - Schneider Energy Services Inc. #402880078 to Helena Resources Inc. #402959885

Jessica,

Can you tell me when the tanks were removed? We will be issuing a facility number for the remaining tanks.

Deb

On Fri, Apr 8, 2022 at 4:17 PM <jdonahue@ardorenvironmental.com> wrote:

Hi Deb,

This is the location we discussed a few weeks ago. It is a unique situation with a lot of multiple operators with overlapping operations. Location 415301 used to have two sets of tanks – one for Mendell Finisterre’s wells, one for Schneider Energy. Schneider does not have a separate Facility ID for their tank battery but it is separate from the registered Mendell Finisterre tanks. The Mendell Finisterre tanks have been removed from location. Schneider still operates the location to support the Ruby 2 well. The off-location flowline does terminate at Location 415301, but is not connected to Mendell Finisterre’s tanks, Facility 415394.

As you can see on the images below, prior to the Mendell wells being P&A’d, there were four tanks on location:



On this more recent image, the location now just has the Schneider tanks:



As for the related inspections/incidents, Schneider has resolved all of these incidents. Please see the attached spreadsheet with notes regarding each incident.

Let me know if you have any other questions.

Jessica

Jessica Donahue
Compliance Specialist
(303) 888-4862



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

Sent: Friday, April 8, 2022 2:42 PM

To: Jeff Schneider <Jeff@schneiderenergy.com>; tapagano@helena-resources.com

Cc: Jessica Donahue <jdonahue@ardorenvironmental.com>

Subject: Re: Form 9 Transfer - Schneider Energy Services Inc. #402880078 to Helena Resources Inc. #402959885

All,

I have reviewed the Form 9 for the above captioned transfer. There is one issue that will need to be addressed. The tank battery (Facility ID 415394, Location ID 415301) that is listed on the Wells and Facilities - Not Transferred list is at the end of the Off-Location Flowline and on one of the locations that is being transferred. If the tank battery will be operated by Helena Resources, then the tank battery will need to be transferred to Helena Resources. COGIS indicates that the current operator is Mendell Finisterre I LLC, Operator 10481. Finisterre's wells have all been plugged and abandoned at this location.

Also noted were 9 incidents not accounted for. As explained to Jessica Donahue, FIRs with outstanding corrective actions that may or may not be resolved 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.

Please reach out with any questions.

Thanks,
Deb

On Mon, Apr 4, 2022 at 5:06 PM Deborah Bracey - DNR <deborah.bracey@state.co.us> wrote:

Good evening Jeff and Theodore,

In accordance with COGCC Rule 218.e.(3), we do not approve a Form 9 Intent on its own; the Form 9 Intent can only be approved in coordination with corresponding Form 9 Subsequent. COGCC Rule 218.d.(1) requires the buyer to submit a Form 9 Subsequent within 7 days of closing of the business transaction. According to the Intent, the transaction was expected to close on 12/01/2021. As of today, the Form 9 Subsequent is 118 days past due and this transfer is not in compliance with COGCC Rules. If the transfer was cancelled, please let me know and I will withdraw the Form 9 Intent. However, if it did occur as scheduled, please submit the Form 9 Subsequent as soon as possible to complete the transfer.

Thanks,
Deb

Deborah Bracey
Accountant



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