



Department of Environmental Quality

To protect, conserve, and enhance the Quality of Wyoming's Environment for the benefit of current and future generations



Mark Gordon, Governor

Todd Parfitt, Director

November 2, 2021

Mr. John Corra
Wyoming Environmental Quality Council
2300 Capital Avenue
Hathaway Building 1st, Room 136
Cheyenne, WY 82002

Subject: Bond Forfeiture Recommendation - Windsor Energy Group, L.L.C.
Voluntary Remediation Program Site No. 58.093

Dear Mr. Corra:

Attached is the required information regarding violations by Windsor Energy Group, L.L.C. (Mr. Brian Ray, Attorney) of restrictions, terms, or conditions of the Remedy Agreement at the Voluntary Remediation Program (VRP) Site No. 58.093. The attached information includes: a VRP Site No. 58.093 File Memorandum and Notice of Violation (NOV) and Order, Docket Number 6118-21.

I have reviewed the supporting information in the attached VRP Site No. 58.093 File Memorandum and have determined that the following performance bond for VRP Site No. 58.093 should be forfeited:

\$341,193.11, Letter of Credit, BOK Financial Services (Bond No. BOK20SDF10510)

At this time, in accordance with Wyoming Statute §35-11-504, I am seeking approval from the Wyoming Environmental Quality Council (EQC) to make a formal request of the Attorney General to begin bond forfeiture proceedings for the aforementioned bond.

If you have any questions, please contact Suzanne Engels, WDEQ/SHWD Administrator at: (307) 777-5447, or suzanne.engels@wyo.gov.

Sincerely,

Date: 11/2/2021

Todd Parfitt
Director, WDEQ



Bond Forfeiture Recommendation - Windsor Energy Group, L.L.C.
VRP Site No. 58.093

Attachments: VRP Site No. 58.093 Bond Forfeiture Recommendation Memorandum;
NOV and Order Docket No. 6118-21

cc: Suzanne Engels, WDEQ/SHWD Administrator
Ben Lucky, WDEQ/SHWD/HW/VRP Program Manager
Steve Lenz, EQC Secretary

MEMORANDUM

TO: Todd Parfitt, WDEQ Director
File, Docket No. 6118-21, VRP 58.093

THROUGH: Suzanne Engels, WDEQ/SHWD Administrator *SE*
Ben Luckey, WDEQ/SHWD/HW/VRP Program Manager

FROM: Jules Feck, WDEQ/SHWD/HW/VRP Natural Resource Program Principal

DATE: October 29, 2021

SUBJECT: Bond Forfeiture Recommendation – Windsor Energy Group, L.L.C.,
VRP Site #58.093

Background:

On February 14, 2007, Windsor Energy Group, L.L.C. (Windsor) entered the Crosby 25-3 Natural Gas Well Release site into the VRP. The well release impacted groundwater with petroleum hydrocarbons in the shallow alluvial aquifer and the deep bedrock aquifer in the Line Creek drainage, near Clark, Wyoming.

Remediation at the Site has been on-going under a Remedy Agreement (RA) executed on January 16, 2012, and a Modification of the RA executed on May 15, 2018, which incorporated the remedy for the bedrock aquifer.

On August 19, 2021, Windsor Energy Group, L.L.C. submitted a letter notifying WDEQ of its cessation of active business operations and activities in the State of Wyoming, with a cessation date of September 22, 2021. A copy of this letter is enclosed.

Violations of the Remedy Agreement:

Windsor has not yet reduced contaminants of concern in the bedrock aquifer below the levels set forth in Section V.B. of the RA or recovered all mobile light non-aqueous phase liquid (LNAPL) to a thickness of <0.01 ft. By ceasing its operations at Site #58.093 before meeting the cleanup levels established in Section V.B. of the RA or achieving the performance objectives specified at Section V.C., Windsor has violated restrictions, terms, or conditions of the RA.

Windsor has also violated the following restrictions, terms, or conditions set forth in the Modification of the RA:

- Section V.A.2. Remedial Alternative Selected, Bedrock Aquifer of the RA requires annual groundwater monitoring in September 2020 and 2021. Windsor has not provided evidence of sampling its groundwater wells for 2020 and 2021.
- Section V.A.2. Remedial Alternative Selected, Bedrock Aquifer of the RA requires annual reporting of operational activities no later than January 30th of each year following the operational activities, including monitoring. Windsor's 2020 Annual

Report was due on January 30, 2021. Windsor has not provided WDEQ with its 2020 Annual Report.

- Section V.A.2. Remedial Alternative Selected, Bedrock Aquifer of the RA requires operation of the pump and treat system for a required number of days as specified in the Remedy Documents identified in the Modification of the RA. In 2020, Windsor was required to conduct the pump and treat system for twenty-eight days. WDEQ does not have evidence that this requirement was fulfilled under the Modification of the RA.

On October 15, 2021, WDEQ issued Windsor a Notice of Violation and Order (Docket No. 6118-21) for its violations of the RA. The Order prohibits Windsor from disturbing existing property or removing equipment associated with or purchased under the RA.

Bond -- BOK Financial Services, Letter of Credit No. BOK20SDF10510:

Windsor holds a Letter of Credit, Bond No. BOK20SDF10510, with BOK Financial Services in the amount of \$341,193.11 for the VRP Site No. 58.093. On October 20, 2021, WDEQ notified BOK Financial Services of the NOV and Order (Docket No. 6118-21) issued by the WDEQ to Windsor for Windsor's violations of the Remedy Agreement at the VRP Site No. 58.093.

Cost Estimate:

Groundwater is impacted with petroleum hydrocarbons in approximately 15 monitoring wells at the Site, with benzene concentrations ranging from 10 – 10,100 µg/L. Modeling based on current conditions and the pump and treat remedy, estimates the remediation timeframe to be seven years. Based on the remaining remediation activities required under the RA, WDEQ anticipates that the current financial assurance may not cover the full cost of remediation.

Based on the aforementioned information, I recommend that the Letter of Credit, Bond No. BOK20SDF10510 be forfeited.

Enclosure: Notice of Violation and Order Docket No. 6118-21
August 19, 2021, Windsor Energy Group, L.L.C. Cessation Letter



Department of Environmental Quality

To protect, conserve, and enhance the Quality of Wyoming's Environment for the benefit of current and future generations



Mark Gordon, Governor

Todd Parfitt, Director

October 15, 2021

CERTIFIED

Brian Ray
Windsor Energy Group, L.L.C.
14301 Caliber Drive, Suite 200
Oklahoma City, OK 73134

Subject: Notice of Violation and Order, Docket Number 6118-21

Dear Mr. Ray:

Enclosed you will find a Notice of Violation (NOV) and Order, Docket Number 6118-21, issued under the provisions of Wyoming Statute §35-11-701(c).

The NOV and Order has been issued to Windsor Energy Group, for violation of the Remedy Agreement at the Voluntary Remediation Program Site #58.093. The NOV includes an Order that prohibits the disturbance of existing property or removal of equipment associated with or purchased under the Remedy Agreement for Site #58.093.

If you have any questions regarding this NOV and Order, please contact Jules Feck at (307) 335-6976.

Todd Parfitt
Director
Department of Environmental Quality

Suzanne Engels
Administrator
Solid and Hazardous Waste Division

TP/SE/AD/OG

Enclosure: Notice of Violation and Order

200 West 17th Street · Cheyenne, WY 82002 · <http://http://deq.wyoming.gov/>

ADMIN/OUTREACH (307) 777-7768 FAX 636-1784	ABANDONED MINES (307) 777-145 FAX 636-1784	AIR QUALITY (307) 777-7391 FAX 636-1784	INDUSTRIAL SITING (307) 777-7369 FAX 636-1784	LAND QUALITY (307) 777-7766 FAX 636-1784	SOLID & HAZ. WASTE (307) 777-7762 FAX 636-1784	WATER QUALITY (307) 777-7781 FAX 636-1784
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**DEPARTMENT OF ENVIRONMENTAL QUALITY
STATE OF WYOMING**

IN THE MATTER OF THE NOTICE)
OF VIOLATION ISSUED TO:)
)
Brian Ray)
Windsor Energy Group, L.L.C.) DOCKET NO. 6118-21
14301 Caliber Drive, Suite 200)
Oklahoma City, OK 73134)
)
Solid and Hazardous Waste Division)
Voluntary Remediation Program)
Site #58.093)

NOTICE OF VIOLATION
AND
ORDER

NOTICE IS HEREBY GIVEN THAT:

1. Notice of Violation (NOV) is being sent to you pursuant to Wyoming Statute § 35-11-701(c) which requires that a written notice be issued in the case of failure to correct or remedy an alleged violation.
2. On February 14, 2007, Windsor Energy Group, LLC (Windsor) entered the Crosby 25-3 Natural Gas Well Release into the Voluntary Remediation Program (VRP), Site #58.093. The Wyoming Department of Environmental Quality (WDEQ) and Windsor entered into a Remedy Agreement (RA) for Site #58.093 on January 16, 2012, and executed a Modification of the RA on May 15, 2018. The bedrock aquifer at Site #58.093 remains impacted by petroleum hydrocarbons above the remedial standards set forth in the RA.
3. Wyoming Statute § 35-11-1607(e) states that “A violation of any use restriction, term or conditions set forth in a Remedy Agreement or certificate of completion shall be deemed a violation of this act, and the department may bring any action for such violation against the owner of the site at the time the violation occurs or against the person who violates the use restriction, term or condition of the remedy agreement or certificate of completion.”
4. On August 19, 2021, Windsor submitted a letter notifying WDEQ of its cessation of active business operations and activities in the State of Wyoming, with a cessation date of September 22, 2021. In its letter, Windsor identified Site #58.093 as a location requiring “at least some level of routine action and/or oversight,” but confirmed that it would no longer be performing this work.
5. The RA for Site #58.093 establishes the remedial requirements for the alluvial aquifer on the Site. The May 15, 2018 Modification incorporates the remedial requirements for the bedrock aquifer on the Site, including phases of remedial activities. On November 12, 2019, WDEQ and Windsor entered an additional agreement to include remedial activities to optimize the bedrock aquifer remedy. To date, Windsor has completed only six of the fourteen phases of its obligation under the Modification of the RA.
6. Section V.C. of the RA, as modified, reads: “The performance objective established for this remedy is reduction of all [contaminants of concern] in

ORDER

WHEREFORE IT IS HEREBY ORDERED THAT:

1. Windsor shall not disturb existing property or remove equipment associated with or purchased under the Remedy Agreement for the implementation of the bedrock remedy as identified in the Modification of the RA for Site #58.093, including but not limited to: electrical power supply, monitoring wells and equipment, equipment associated with the pump and treat system operation (i.e. pumps, tubing, containment tanks, power supply manifold, etc.), and fencing around monitoring wells and study area.


THIS ORDER is final unless, not later than 10 days after the date this notice is received, it is appealed by filing a written petition for a hearing before the Environmental Quality Council. If a hearing is requested, the petition shall be mailed to the Chairman, Wyoming Environmental Quality Council, 2300 Capitol Ave, Hathaway Building, 1st Floor, Room 136, Cheyenne, Wyoming 82002. The petition shall also be mailed to the Director, Wyoming Department of Environmental Quality, 200 West 17th Street, 4th Floor, Cheyenne, Wyoming 82002. Both copies of the petition must be sent by registered mail, return receipt requested.

NOTHING IN THE NOTICE shall be interpreted to in any way limit or contravene any other remedy available under the Environmental Quality Act, nor shall this NOV and ORDER be interpreted as being a condition precedent to any other enforcement action.

SIGNED this 15th day of October, 2021



Todd Parfitt
Director
Department of Environmental Quality



Suzanne Engels
Administrator
Solid and Hazardous Waste Division

PLEASE DIRECT ALL INQUIRIES regarding this Notice of Violation and Order to:
Jules Feck, Natural Resources Program Principal and Voluntary Remediation Program
Project Manager at 510 Meadowview Dr., Lander, WY, 82520, (307) 335-6976.

cc: File 58.093



August 19, 2021

Wyoming Department of Environmental Quality
200 W. 17th St.
Cheyenne, WY 82001
Attn: Mr. Todd Parfitt, *Director*

Wyoming Oil and Gas Conservation Commission
2211 King Blvd.
Casper, WY 82604
Attn: Tom Kropatsch, *Deputy Supervisor*

Wyoming Office of State Lands & Investments
122 West 25th Street, Herschler, Bldg. 1W.
Cheyenne, WY 82002
Attn: Jennifer Scoggin, *Director*

BLM Wyoming - Bureau of Land Management
5353 Yellowstone Rd.
Cheyenne, WY 82009
Attn: Kim Liebhauser, *Acting State Director*

Re: Cessation of Business Operations

Agency Representatives,

This correspondence (this "Notification") will serve as the sole and formal notification of, and on behalf of, the undersigned (collectively, for purposes of this Notification only, "Windsor") with respect to the permanent cessation of active business operations and activities ("Operations") in the State of Wyoming ("Wyoming"). The last date upon which any Windsor entity will undertake any action, other than any passive action(s) singularly pertaining to the winding up of its affairs, will be Wednesday, September 22nd, 2021 (the "Cessation Date").

Windsor has conducted extensive and successful oil and gas exploration, development and production related activities and operations in Wyoming for nearly two decades. Historically, the relationship between Windsor and the various State Agencies of Wyoming has been a relatively positive one. Windsor desires for such relative positivity to continue during this difficult period.

The decision to cease Operations was one which was forced upon Windsor by the reality of the myriad of difficult circumstances and challenges that Windsor has faced for many years, including those faced as of the date of this Notification.

One such difficulty included the contamination by Whiting Oil Company of Windsor's "Jepson Draw" field, located in Johnson County, WY. The company's resources dwindled, and the field

fell into a sub-optimal state of condition, while Windsor endeavored to hold Whiting responsible for Whiting's crude oil contamination of the freshwater aquifer from which Windsor responsibly produced natural gas. Ultimately, Windsor was forced to initiate litigation, with Judge William J. Edelman agreeing with Windsor's allegations. An annotated copy of the Judgment is included herewith for your reference, and can be summarized, in part, as provided below:

"Whiting had a continuing duty to inspect and maintain its equipment – specifically, its casing and tubing – in such a manner as to prevent leaks and damage to property of others" ... "Whiting breached that duty when [Whiting] failed to inspect and maintain its equipment, thereby causing damage to Windsor". ... "It is undisputed that on several occasions, crude oil originating from the formation Whiting was (and still is) drilling from invaded [Windsor's] water outfall..." and, "...Whiting has interfered with Windsor's use and enjoyment of [Windsor's] property...and has committed the tort of trespass" ... "[Whiting's] failure to remove the contaminating oil has resulted in the trespass being continuous and ongoing". Judge Edelman goes on to opine that, "...evidence shows that 14 [Windsor] wells were contaminated, and resulting from the contamination of those 14 wells, Windsor made the decision to plug and abandon the entire [Jepson Draw] field."

For many years, Windsor has endeavored to work with various State Agencies of Wyoming under creative solutions or arrangements whereby Windsor could undertake various plugging, abandonment, reclamation and/or remediation related activities ("Actions") upon its assets in Wyoming by indirectly availing itself to funds otherwise inaccessible to it in the form of performance bonds, letters of credit, financial assurance, and the like (the "Bonds").

One instance of a relatively successful Action was the arrangement between Windsor and the Wyoming Department of Environmental Quality ("WDEQ") relative to VRP Site #2093 (the "Crosby Blowout"), whereby Windsor undertook certain Actions on a phase-by-phase basis, incrementally receiving reductions in the required level of Bonding, with proceeds of the same then plowed back into a successive phase. This accorded Windsor the benefit of more fully performing under its various commitments, while ensuring that appropriate levels of Bonding remained posted to secure the site. Copies of certain illuminative correspondence are attached hereto for your reference.

One instance of an unsuccessful attempt by Windsor to undertake Actions in a manner similar to that successfully employed in the Crosby Blowout relates to the Wyoming Office of State Lands and Investments ("WOSLI"). In such instance, despite approximately 11 months' worth of nearly wholly Windsor-driven correspondence and proposals, WOSLI ultimately ceased in its already sparse and largely disjointed correspondence despite having, "*a formal response drafted...and awaiting approval.*" A copy of certain correspondence transpiring relatively near the inception of the discussion of proposed Activities (conference calls occurring in early June 2020) is attached for your convenience.

In the period of time leading up to the Cessation Date, Windsor will undertake to cause for the termination of the entirety of its employees, consultants, contractors and vendors such that, upon the Cessation Date, Windsor will be fully devoid of staff or engaged third parties. Simply put, despite its best efforts, Windsor is without financial means to Operate, much less compensate employees, contractors or vendors, beyond the Cessation Date.

Necessarily, from and after the Cessation Date, those assets previously overseen by Windsor will no longer be so supervised or managed, nor will there be any personnel (Windsor or third party) to rely upon for purposes of responding to any situationally necessary events which may unfold. In an effort at operational stewardship, and in a show of good faith, Windsor calls to the attention of the recipients of this Notification the following matters which, while not presently in an a foreseeably dangerous condition, are known to Windsor to require at least some level of routine action and/or oversight to ensure that no dangerous and/or deleterious condition is capable of manifesting.

Jepson Draw (Johnson County, Wyoming)

Location "huts" may, from time to time, blow free from their otherwise secured condition during instances of high winds or other periods of temperamental weather.

Bennet Creek / Crosby / Central / Sugarloaf (Park County, Wyoming)

The Bennett Creek 25-1 Well (API No. 49-029-30983) has, from time to time, required enhanced inspection with respect to the frequency of the monitoring of its wellhead pressure.

VRP Site #2093 includes a number of monitoring and/or "pump-and-treat" wells, together with related and proximate surface facilities which, while inactive, may benefit from reasonably routine or continued oversight or maintenance.

Windsor does not have any producing wells, nor does it have "active" operations. Windsor's assets do, however, include a number of shut-in, temporarily abandoned, inactive, or otherwise non-producing wells. It also owns a number of production related surface facilities, and at least one pipeline. Windsor has included the attached "Asset List" in a further effort at providing a beneficial, albeit generalized and non-exhaustive, listing of its oil and gas related interests located in Wyoming.

As would be expected from an outfit which has conducted operations in a particular state for nearly two decades, Windsor will continue to have certain interests (generally described above) and involvement in Wyoming after the Cessation Date. In an attempt at making the winding up of its affairs more seamless for all parties involved, including the various State Agencies of Wyoming, Windsor has made arrangements with two of its current employees for purposes of effectuating any passive action(s) singularly pertaining to the winding up of its affairs which occur after the Cessation Date. For removal of doubt, such arrangements are made in a post-employment capacity only, as such individuals will no longer be employees of Windsor following the Cessation date.

Name	Present Title	Phone	Email
Shane Gray	<i>Vice President - Accounting and Finance</i>	405-850-0177	LegacyWindsor@gmail.com
Brian Ray	<i>Corporate Attorney</i>	918-698-4441	LegacyWindsor@gmail.com

Windsor encourages interested parties to reach out to such individuals as necessary in conjunction with any cessation-of-business-related procedural matters which may transpire, or questions which may arise, from and after the Cessation Date. The continued availability of such individuals is relatively fluid, but it is anticipated that such accessibility will continue for some reasonable, yet limited, period of time.

Windsor appreciates the capacities, availabilities, and efforts of the recipients of this Notification and reiterates its desire for a relatively smooth path forward with respect to the winding up of its affairs, both prior to and beyond the Cessation Date.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jay Thomas", written over a horizontal line.

Jay Thomas, *Land Manager*
Windsor Energy Group, L.L.C.
Windsor Jepson LLC
Windsor Wyoming LLC
14301 Caliber Dr., Suite 200
Oklahoma City, OK 73134
(d) 405-607-3612
jthomas@windsorenergy.com

APPROXIMATED WINDSOR ASSET LIST

August 19, 2021

Windsor Jepson LLC

<u>API Number</u>	<u>Operator</u>	<u>Lease Name</u>	<u>Well Name</u>
49-019-27905	WINDSOR ENERGY GROUP LLC	STREETER FEDERAL BG	41-01-44-78
49-019-27906	WINDSOR ENERGY GROUP LLC	STREETER FEDERAL BG	32-01-44-78
49-019-27864	WINDSOR ENERGY GROUP LLC	FEDERAL BG	12-04-44-77
49-019-27865	WINDSOR ENERGY GROUP LLC	STREETER FEDERAL BG	14-04-44-77
49-019-28155	WINDSOR ENERGY GROUP LLC	STREETER FEDERAL-BG	23-04-44-77
49-019-28156	WINDSOR ENERGY GROUP LLC	FEDERAL-BG	21-04-44-77
49-019-27926	WINDSOR ENERGY GROUP LLC	STREETER FEDERAL BG	41-05-44-77
49-019-27927	WINDSOR ENERGY GROUP LLC	STREETER FEDERAL BG	34-05-44-77
49-019-27928	WINDSOR ENERGY GROUP LLC	STREETER FEDERAL BG	32-05-44-77
49-019-27929	WINDSOR ENERGY GROUP LLC	STREETER FEDERAL BG	23-05-44-77
49-019-27930	WINDSOR ENERGY GROUP LLC	STREETER FEDERAL BG	21-05-44-77
49-019-27931	WINDSOR ENERGY GROUP LLC	STREETER FEDERAL BG	14-05-44-77
49-019-27932	WINDSOR ENERGY GROUP LLC	STREETER FEDERAL BG	12-05-44-77
49-019-28154	WINDSOR ENERGY GROUP LLC	STREETER FEDERAL-BG	43-05-44-77
49-019-27918	WINDSOR ENERGY GROUP LLC	STREETER FEDERAL BG	43-06-44-77
49-019-27919	WINDSOR ENERGY GROUP LLC	STREETER FEDERAL BG	41-06-44-77
49-019-27920	WINDSOR ENERGY GROUP LLC	STREETER FEDERAL BG	34-06-44-77
49-019-27921	WINDSOR ENERGY GROUP LLC	STREETER FEDERAL BG	32-06-44-77
49-019-27922	WINDSOR ENERGY GROUP LLC	STREETER FEDERAL BG	23-06-44-77
49-019-27923	WINDSOR ENERGY GROUP LLC	STREETER FEDERAL BG	21-06-44-77
49-019-27924	WINDSOR ENERGY GROUP LLC	STREETER FEDERAL BG	14-06-44-77
49-019-27925	WINDSOR ENERGY GROUP LLC	STREETER FEDERAL BG	12-06-44-77
49-019-27912	WINDSOR ENERGY GROUP LLC	STREETER FEDERAL BG	43-07-44-77
49-019-27913	WINDSOR ENERGY GROUP LLC	STREETER FEDERAL BG	41-07-44-77
49-019-27914	WINDSOR ENERGY GROUP LLC	STREETER FEDERAL BG	34-07-44-77
49-019-27915	WINDSOR ENERGY GROUP LLC	STREETER FEDERAL BG	32-07-44-77
49-019-27916	WINDSOR ENERGY GROUP LLC	STREETER FEDERAL BG	21-07-44-77
49-019-27917	WINDSOR ENERGY GROUP LLC	STREETER FEDERAL BG	12-07-44-77
49-019-27909	WINDSOR ENERGY GROUP LLC	STREETER FEDERAL BG	32-08-44-77
49-019-27910	WINDSOR ENERGY GROUP LLC	STREETER FEDERAL BG	23-08-44-77
49-019-27911	WINDSOR ENERGY GROUP LLC	STREETER FEDERAL BG	12-08-44-77
49-019-28147	WINDSOR ENERGY GROUP LLC	STREETER FEDERAL-BG	41-08-44-77
49-019-28149	WINDSOR ENERGY GROUP LLC	STREETER FEDERAL-BG	21-08-44-77
49-019-28152	WINDSOR ENERGY GROUP LLC	STREETER FEDERAL-BG	14-08-44-77

49-019-21814	WINDSOR ENERGY GROUP LLC	STREETER-ED	12-09-44-77
49-019-21817	WINDSOR ENERGY GROUP LLC	STREETER-ED	14-09-44-77
49-019-21833	WINDSOR ENERGY GROUP LLC	STREETER	ED 23-09-44-77
49-019-22092	WINDSOR ENERGY GROUP LLC	STREETER-ED	21-09B-44-77
49-019-22875	WINDSOR ENERGY GROUP LLC	STREETER-KC	14-09-44-77
49-019-22876	WINDSOR ENERGY GROUP LLC	STREETER-BG	14-09-44-77
49-019-22930	WINDSOR ENERGY GROUP LLC	STREETER-KC	32-09-44-77
49-019-22931	WINDSOR ENERGY GROUP LLC	STREETER-MW	21-09-44-77
49-019-22932	WINDSOR ENERGY GROUP LLC	STREETER-BG	21-09-44-77
49-019-22933	WINDSOR ENERGY GROUP LLC	STREETER-BG	12-09-44-77
49-019-22934	WINDSOR ENERGY GROUP LLC	STREETER-MW	12-09-44-77
49-019-22935	WINDSOR ENERGY GROUP LLC	STREETER	KC21-09-44-77
49-019-22936	WINDSOR ENERGY GROUP LLC	STREETER-KC	12-09-44-77
49-019-23739	WINDSOR ENERGY GROUP LLC	STREETER-KC	41-09-44-77
49-019-27464	WINDSOR ENERGY GROUP LLC	FEDERAL KC	43-15-44-77
49-019-27465	WINDSOR ENERGY GROUP LLC	FEDERAL KC	34-15-44-77
49-019-27431	WINDSOR ENERGY GROUP LLC	STREETER FEDERAL KC	23-15-44-77
49-019-27432	WINDSOR ENERGY GROUP LLC	STREETER FEDERAL KC	21-15-44-77
49-019-27433	WINDSOR ENERGY GROUP LLC	STREETER FEDERAL KC	14-15-44-77
49-019-27434	WINDSOR ENERGY GROUP LLC	STREETER FEDERAL KC	12-15-44-77
49-019-27418	WINDSOR ENERGY GROUP LLC	ED & MW STATE	33-16-44-77
49-019-27419	WINDSOR ENERGY GROUP LLC	ED & MW STATE	22-16-44-77
49-019-27420	WINDSOR ENERGY GROUP LLC	BG & KC STATE	22-16-44-77
49-019-27421	WINDSOR ENERGY GROUP LLC	BG & KC STATE	33-16-44-77
49-019-25890	WINDSOR ENERGY GROUP LLC	STATE-KC	43-16-44-77
49-019-25891	WINDSOR ENERGY GROUP LLC	STATE-BG	43-16-44-77
49-019-25892	WINDSOR ENERGY GROUP LLC	STATE-ED	43-16-44-77
49-019-25893	WINDSOR ENERGY GROUP LLC	STATE-BG	41-16-44-77
49-019-25894	WINDSOR ENERGY GROUP LLC	STATE-BG	12-16-44-77
49-019-25895	WINDSOR ENERGY GROUP LLC	STATE-BG	14-16-44-77
49-019-25896	WINDSOR ENERGY GROUP LLC	STATE-BG	23-16-44-77
49-019-25899	WINDSOR ENERGY GROUP LLC	STATE-ED	12-16-44-77
49-019-25900	WINDSOR ENERGY GROUP LLC	STATE-ED	14-16-44-77
49-019-25901	WINDSOR ENERGY GROUP LLC	STATE-ED	23-16-44-77
49-019-25904	WINDSOR ENERGY GROUP LLC	STATE-KC	12-16-44-77
49-019-25905	WINDSOR ENERGY GROUP LLC	STATE-KC	14-16-44-77
49-019-25906	WINDSOR ENERGY GROUP LLC	STATE-KC	23-16-44-77
49-019-25907	WINDSOR ENERGY GROUP LLC	STATE BG-KC	32-16-44-77
49-019-25908	WINDSOR ENERGY GROUP LLC	STATE-KC	34-16-44-77
49-019-23775	WINDSOR ENERGY GROUP LLC	STATE-ED	21-16-44-77
49-019-23776	WINDSOR ENERGY GROUP LLC	STATE-KC	41-16-44-77

49-019-23777	WINDSOR ENERGY GROUP LLC	STATE-ED	41-16-44-77
49-019-23778	WINDSOR ENERGY GROUP LLC	STATE-KC	21-16-44-77
49-019-23779	WINDSOR ENERGY GROUP LLC	STATE-BG	21-16-44-77
49-019-21823	WINDSOR ENERGY GROUP LLC	STATE	MW 21-16-44-77
49-019-21824	WINDSOR ENERGY GROUP LLC	STATE-MW	41-16-44-77
49-019-21825	WINDSOR ENERGY GROUP LLC	STATE	12-16-44-77
49-019-21826	WINDSOR ENERGY GROUP LLC	STATE ED-MW	32-16-44-77
49-019-21827	WINDSOR ENERGY GROUP LLC	STATE	MW 23-16-44-77
49-019-21828	WINDSOR ENERGY GROUP LLC	STATE-MW	43-16-44-77
49-019-21829	WINDSOR ENERGY GROUP LLC	STATE	MW 14-16-44-77
49-019-25868	WINDSOR ENERGY GROUP LLC	STREETER-KC	12-17-44-77
49-019-25870	WINDSOR ENERGY GROUP LLC	STREETER-BG	21-17-44-77
49-019-25871	WINDSOR ENERGY GROUP LLC	STREETER-KC	21-17-44-77
49-019-23769	WINDSOR ENERGY GROUP LLC	STREETER-KC	41-17-44-77
49-019-23771	WINDSOR ENERGY GROUP LLC	STREETER-BG	41-17-44-77
49-019-23772	WINDSOR ENERGY GROUP LLC	STREETER-KC	32-17-44-77
49-019-26396	WINDSOR ENERGY GROUP LLC	STREETER BG-KC	23-17-44-77
49-019-26398	WINDSOR ENERGY GROUP LLC	STREETER BG-KC	14-17-44-77
49-019-27420	WINDSOR ENERGY GROUP LLC	STREETER FEDERAL KC	43-17-44-77
49-019-26412	WINDSOR ENERGY GROUP LLC	STREETER BG-KC	43-18-44-77
49-019-27428	WINDSOR ENERGY GROUP LLC	STREETER FEDERAL KC	41-20-44-77
49-019-27429	WINDSOR ENERGY GROUP LLC	STREETER FEDERAL KC	32-20-44-77
49-019-27424	WINDSOR ENERGY GROUP LLC	GLEGHORN FEDERAL	KC 23-21-44-77
49-019-27425	WINDSOR ENERGY GROUP LLC	STREETER FEDERAL KC	21-21-44-77
49-019-27426	WINDSOR ENERGY GROUP LLC	GLEGHORN FEDERAL KC	14-21-44-77
49-019-27427	WINDSOR ENERGY GROUP LLC	STREETER FEDERAL KC	12-21-44-77
49-019-27460	WINDSOR ENERGY GROUP LLC	FEDERAL KC	43-21-44-77
49-019-27461	WINDSOR ENERGY GROUP LLC	FEDERAL KC	41-21-44-77
49-019-27462	WINDSOR ENERGY GROUP LLC	FEDERAL KC	34-21-44-77
49-019-27463	WINDSOR ENERGY GROUP LLC	FEDERAL KC	32-21-44-77
49-019-27456	WINDSOR ENERGY GROUP LLC	FEDERAL KC	43-22-44-77
49-019-27457	WINDSOR ENERGY GROUP LLC	FEDERAL KC	41-22-44-77
49-019-27458	WINDSOR ENERGY GROUP LLC	FEDERAL KC	34-22-44-77
49-019-27459	WINDSOR ENERGY GROUP LLC	FEDERAL KC	32-22-44-77
49-019-21304	WINDSOR ENERGY GROUP LLC	JOHNSON	BG 14-22-44-77
49-019-25872	WINDSOR ENERGY GROUP LLC	STREETER-KC	12-22-44-77
49-019-25873	WINDSOR ENERGY GROUP LLC	JOHNSON-KC	14-22-44-77
49-019-25874	WINDSOR ENERGY GROUP LLC	STREETER-KC	21-22-44-77
49-019-25875	WINDSOR ENERGY GROUP LLC	JOHNSON-KC	23-22-44-77
49-019-21822	WINDSOR ENERGY GROUP LLC	JOHNSON-BG	23-22-44-77
49-019-21831	WINDSOR ENERGY GROUP LLC	STREETER	12-22-44-77

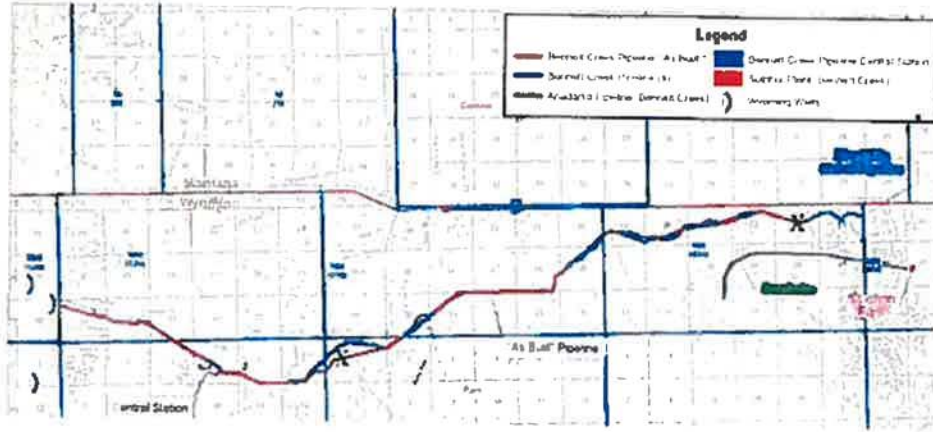
49-019-27446	WINDSOR ENERGY GROUP LLC	JOHNSON FEDERAL KC	43-26-44-77
49-019-27447	WINDSOR ENERGY GROUP LLC	JOHNSON FED KC	23-26-44-77
49-019-27448	WINDSOR ENERGY GROUP LLC	JOHNSON FEDERAL KC	34-26-44-77
49-019-27449	WINDSOR ENERGY GROUP LLC	JOHNSON FEDERAL KC	14-26-44-77
49-019-27391	WINDSOR ENERGY GROUP LLC	JOHNSON	23-27-44-77BG-KC
49-019-27392	WINDSOR ENERGY GROUP LLC	JOHNSON	33-27-44-77BG-KC
49-019-21296	WINDSOR ENERGY GROUP LLC	JOHNSON-BG	12-27-44-77
49-019-21297	WINDSOR ENERGY GROUP LLC	JOHNSON-BG	23-27-44-77
49-019-21298	WINDSOR ENERGY GROUP LLC	JOHNSON	BG 14-27-44-77
49-019-21299	WINDSOR ENERGY GROUP LLC	JOHNSON-BG	34-27-44-77
49-019-21300	WINDSOR ENERGY GROUP LLC	JOHNSON-BG	41-27-44-77
49-019-21301	WINDSOR ENERGY GROUP LLC	JOHNSON-BG	32-27-44-77
49-019-21302	WINDSOR ENERGY GROUP LLC	JOHNSON-BG	43-27-44-77
49-019-25878	WINDSOR ENERGY GROUP LLC	JOHNSON-KC	12-27-44-77
49-019-25879	WINDSOR ENERGY GROUP LLC	JOHNSON-KC	14-27-44-77
49-019-25880	WINDSOR ENERGY GROUP LLC	JOHNSON-KC	21-27-44-77
49-019-25881	WINDSOR ENERGY GROUP LLC	JOHNSON-KC	23-27-44-77
49-019-25882	WINDSOR ENERGY GROUP LLC	JOHNSON-KC	32-27-44-77
49-019-25883	WINDSOR ENERGY GROUP LLC	JOHNSON-KC	34-27-44-77
49-019-25884	WINDSOR ENERGY GROUP LLC	JOHNSON-KC	41-27-44-77
49-019-25885	WINDSOR ENERGY GROUP LLC	JOHNSON-KC	43-27-44-77
49-019-25887	WINDSOR ENERGY GROUP LLC	JOHNSON BG-KC	14-28-44-77
49-019-25889	WINDSOR ENERGY GROUP LLC	JOHNSON BG-KC	23-28-44-77
49-019-27435	WINDSOR ENERGY GROUP LLC	JOHNSON FEDERAL KC	12-28-44-77
49-019-27451	WINDSOR ENERGY GROUP LLC	FEDERAL KC	43-28-44-77
49-019-27452	WINDSOR ENERGY GROUP LLC	FEDERAL KC	41-28-44-77
49-019-27453	WINDSOR ENERGY GROUP LLC	FEDERAL KC	34-28-44-77
49-019-27454	WINDSOR ENERGY GROUP LLC	FEDERAL KC	32-28-44-77
49-019-27455	WINDSOR ENERGY GROUP LLC	FEDERAL KC	21-28-44-77
49-019-26383	WINDSOR ENERGY GROUP LLC	DRY FORK KC	34-29-44-77
49-019-26381	WINDSOR ENERGY GROUP LLC	DRY FORK KC	41-32-44-77
49-019-26377	WINDSOR ENERGY GROUP LLC	DRY FORK KC	34-33-44-77
49-019-26379	WINDSOR ENERGY GROUP LLC	DRY FORK BG-KC	33-33-44-77
49-019-27436	WINDSOR ENERGY GROUP LLC	JOHNSON FEDERAL KC	12-34-44-77
49-019-27437	WINDSOR ENERGY GROUP LLC	JOHNSON FEDERAL KC	13-34-44-77
49-019-27438	WINDSOR ENERGY GROUP LLC	JOHNSON FEDERAL KC	21-34-44-77
49-019-27439	WINDSOR ENERGY GROUP LLC	JOHNSON FEDERAL KC	23-34-44-77
49-019-27440	WINDSOR ENERGY GROUP LLC	JOHNSON FEDERAL KC	34-34-44-77
49-019-27441	WINDSOR ENERGY GROUP LLC	JOHNSON FEDERAL KC	41-34-44-77
49-019-27442	WINDSOR ENERGY GROUP LLC	JOHNSON FEDERAL KC	43-34-44-77
49-019-27450	WINDSOR ENERGY GROUP LLC	FEDERAL KC	32-34-44-77

49-019-27466	WINDSOR ENERGY GROUP LLC	FEDERAL KC	14-35-44-77
49-019-27661	WINDSOR ENERGY GROUP LLC	JOHNSON-BG	32R-35-44-77
49-019-27443	WINDSOR ENERGY GROUP LLC	JOHNSON FEDERAL KC	13-35-44-77
49-019-27444	WINDSOR ENERGY GROUP LLC	JOHNSON FEDERAL KC	21-35-44-77
49-019-27445	WINDSOR ENERGY GROUP LLC	JOHNSON FEDERAL KC	23-35-44-77
49-019-21904	WINDSOR ENERGY GROUP LLC	JOHNSON-BG	34-35-44-77
49-019-21908	WINDSOR ENERGY GROUP LLC	JOHNSON	43-35-44-77
49-019-21909	WINDSOR ENERGY GROUP LLC	JOHNSON-BG	41-35-44-77

Windsor Wyoming LLC

49-029-21821	Windsor Energy Group L L C	Fee & State	BENNETT CREEK 36-1
49-029-30973	Windsor Energy Group L L C	Fee & State	BENNETT CREEK 36-2
49-029-30979	Windsor Energy Group L L C	Fee & State	BENNETT CREEK 36-3
49-029-30983	Windsor Energy Group L L C	Fee & BLM	BENNETT CREEK 25-1
49-029-31113	Windsor Energy Group L L C	Fee	CROSBY 25-2
49-029-31114	Windsor Energy Group L L C	Fee	CROSBY 25-3

Pipeline Plat



Pipeline ROWs

Grantor	Grantee	Date	Legal	County	State	Book Page
Denney FTP, Limited Partnership	Windsor Wyoming LLC	5/20/2004	<u>TSN R101W</u> Sec 5 Lots 3 & 4 Sec 6 lot 3, 4, 5, 7 & 8 <u>TSBN R101W</u> Sec 32 SESW	Park	Wyoming	2005 542
Sinclair Oil Corporation, d/b/a Sunlight Ranzh Company	Windsor Wyoming LLC	10/14/2004	<u>TSBN R101W</u> Sec 32 W2SE, NESE Sec 33: NWSW SWNW, E2HW, MWNE	Park	Wyoming	2005 943
The Landin Company	Windsor Wyoming LLC	5/1/2004	<u>TSBN R101W</u> Sec. 24: SESE Sec. 25: NWSW, S2NW, W2NE, NENE Sec. 26: E2SE Sec. 33: NWNE, NENE Sec. 34 N2N2 Sec. 35: N2N2	Park	Wyoming	2005 944
Rodney L. Crosby & Josephine M. Crosby	Windsor Wyoming LLC	6/7/2004	<u>TSBN R100W</u> Sec. 19. Lots 6 & 7, NESW, MWSE, E2SE Sec. 21 N2SW, SENW, S2NE, N2SE	Park	Wyoming	2005 945
WYW-160172	Windsor Energy Group, LLC	3/27/2006	<u>TSBN R100W</u> Sec. 20: S2 Sec. 22: S2N2 Sec. 23 S2NW, NESW, NWSE (Rows and Except) <u>TSBN R102W</u> Sec. 22 S2 <u>TSBN R102</u> Sec. 4 NE	Park	Wyoming	

Sugarloaf Gas Plant ROW's

Grantor	Grantee	Date	Legal	County	State	Book Page
WYW 165792	Windsor Energy Group, LLC	6/25/2007	<u>TSBN R100W</u> Sec. 23: SENW, NESW	Park	Wyoming	
WYW-165811	Windsor Energy Group, LLC	8/8/2007	<u>TSBN R100W</u> Sec 23 SENW, NESW	Park	Wyoming	
WYW-165812	Windsor Energy Group, LLC	8/8/2007	<u>TSBN R100W</u> Sec. 23 SENW, NESW	Park	Wyoming	
WYW 165820	Windsor Energy Group, LLC	8/8/2007	<u>TSBN R100W</u> Sec 23: SENW, NESW	Park	Wyoming	
Park County ROW Permat 2007 130	Windsor Energy Group, LLC	6/18/2007	<u>TSBN R100W</u> Sec 23: SENW, NESW	Park	Wyoming	