

Matt VanWormer, WSB #7-5804
Senior Assistant Attorney General
Wyoming Attorney General’s Office
109 State Capitol
Cheyenne, WY 82002
(307) 777-6199
matt.vanwormer@wyo.gov

**BEFORE THE ENVIRONMENTAL QUALITY COUNCIL
STATE OF WYOMING**

IN THE MATTER OF THE BOND)
FORFEITURE PROCEEDINGS)
AGAINST THE BOND OF) **Docket No. 21-5501**
In Re Windsor Energy Group, LLC)
58.093)

MOTION FOR BOND FORFEITURE

The Department of Environmental Quality, Solid and Hazardous Waste Division, through the Wyoming Attorney General’s Office, requests that the Environmental Quality Council issue an order forfeiting Windsor Energy Group, LLC’s performance bond pursuant to Wyo. Stat. Ann. § 35-11-504(j). The Department states the following in support of this motion:

1. On February 14, 2007, Windsor Energy Group, LLC (Windsor) entered the Crosby 25-3 Natural Gas Well Release Site into the Department of Environmental Quality’s Voluntary Remediation Program (VRP). A release at this well site (VRP Site No. 58.093) impacted groundwater within a shallow alluvial aquifer and deep bedrock aquifer in the Line Creek drainage near Clark, Wyoming.

2. The Department and Windsor agreed upon remediation measures for VRP Site No. 58.093 in a Remedy Agreement executed on January 16, 2012, and a Modification executed on May 15, 2018.

3. Pursuant to Wyo. Stat. Ann. § 35-11-1607(b)(i), Windsor posted a bond to ensure the performance and maintenance of any required engineering controls and monitoring activities at VRP Site No. 58.093. Specifically, Windsor posted a \$341,193.11 irrevocable letter of credit, Bond No. BOK20SDF10510, issued by BOKF, NA. Ex. A.

4. On August 19, 2021, Windsor notified the Department that it was ceasing active business operations in Wyoming. Windsor described VRP Site No. 58.093 as requiring “at least some level of routine action and/or oversight,” but confirmed it would not be performing any future operations at this Site. Ex. B.

5. On October 15, 2021, the Department issued a Notice of Violation and Order to Windsor, explaining that Windsor had violated restrictions, terms, and conditions of the 2012 Remedy Agreement and 2018 Modification. Ex. C. Windsor’s violations include:

- a. Failure to achieve the performance objectives set forth in the Remedy Agreement and Modification, including failure to reduce contaminants of concern in the bedrock aquifer below required levels and failure to recover all mobile light non-aqueous phase liquid to a thickness of <0.01 feet;
- b. Failure to provide evidence of groundwater well sampling for 2020 and 2021;
- c. Failure to provide a 2020 Annual Report to the Department; and

d. Failure to provide evidence of at least twenty-eight days of pump and treat system operation in 2020.

6. Based on the facts set forth above, the Department determined that Windsor's performance bond for VRP Site No. 58.093 should be forfeited.

7. On November 2, 2021, in accordance with Wyo. Stat. Ann. § 35-11-504(h), Director Todd Parfitt filed a Bond Forfeiture Recommendation with the Council, requesting approval to have the Attorney General's Office begin bond forfeiture proceedings against Windsor.

8. On November 16, 2021, the Council approved the Department's request to initiate bond forfeiture proceedings.

9. On November 23, 2021, the Attorney General's Office sent notice of the forfeiture proceedings to Windsor and BOKF, NA by certified mail. Ex. D.

10. The notice stated that the Council may enter an order forfeiting Bond No. BOK20SDF10510, in the amount of \$341,193.11, unless Windsor or BOKF, NA requested a hearing within thirty days. *Id.*

11. The notice was delivered to Windsor on November 27, 2021, and BOKF, NA on November 29, 2021. Ex. E.

12. Neither Windsor nor BOKF, NA has requested a hearing before the Council.

13. Wyoming Statute § 35-11-504(j)(i) authorizes the Director, with the Council's approval, to "[e]xpend forfeited funds to remedy and abate the circumstances with respect to which the bond was provided."

WHEREFORE, the Department requests that the Council enter an order forfeiting Windsor's performance bond of \$341,193.11, to be used by the Department to continue the performance and maintenance of any required engineering controls and monitoring activities at VRP Site No. 58.093.

Dated this 20th day of January, 2022.



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109 State Capitol
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*Attorney for the Wyoming
Department of Environmental Quality*

CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing *Motion for Bond Forfeiture* upon the persons listed below, this 20th day of January, 2022, addressed as follows:

Wyoming EQC (Original) – By Inter-Agency Mail

Attn: Joe Girardin
2300 Capitol Ave.
Hathaway Bldg. 1st, Room 136
Cheyenne, Wyoming 82002

Windsor Energy Group, LLC - By US Mail

Attn: Shane Gray
VP, Accounting and Finance
14301 Caliber Drive, Suite 200
Oklahoma City, Oklahoma 73134

BOKF, NA – By US Mail

Attn: Andy Krider
VP, International Manager
International Department
One Williams Center - Plaza East
Tulsa, Oklahoma 74172



Cheryl Lobb, Paralegal
Wyoming Attorney General's Office

IRREVOCABLE LETTER OF CREDIT NO.	
BOK20SDF10510	
Permit No.: 58.093	Amount: \$341,193.11
Applicant/Operator and Address: WINDSOR ENERGY GROUP, L.L.C. C/O WINDSOR WYOMING LLC 14301 CALIBER DRIVE, SUITE 300 OKLAHOMA CITY OK 73134	Beneficiary and Address: WYOMING DEPARTMENT OF ENVIRONMENTAL QUALITY – SOLID & HAZARDOUS WASTE DIVISION 200 W. 17 TH STREET, SUITE 400 CHEYENNE, WY 82002
Bank Name and Address: BOKF, NA INTERNATIONAL DEPARTMENT ONE WILLIAMS CENTER - PLAZA EAST TULSA, OK 74172	
Date of Issue: JUNE 2, 2020	Date of Expiry: 3/14/21

Dear Sir or Madam:

We hereby establish our irrevocable letter of credit in your favor, available by your drafts at sight drawn on the Bank Name and Address above, accompanied by the following document:

A signed and dated statement from the Director of the Department of Environmental Quality and the Solid & Hazardous Waste Administrator in any one of two following forms:

a. "The undersigned hereby advise that an order in an amount identical to the amount of the sight draft which this statement accompanies has been entered by the Industrial Siting Council pursuant to the rules and regulations of the Solid and Hazardous Waste Division, forfeiting all or part of the amount of the credit because of any violation of the Wyoming Environmental Quality Act, by the Applicant/Operator in the above mentioned Permit No. A certified copy of the order of forfeiture is attached."

b. "The undersigned hereby advise that a Settlement Agreement in an amount identical to the amount of the sight draft which this statement accompanies has been signed on behalf of the Department of Environmental Quality and on behalf of the Applicant/Operator in the above mentioned Permit No., in which the parties have agreed to an amount due to the Department because of a violation of the Wyoming Environmental Quality Act, and that the Applicant/Operator has failed to pay the amount due within the period of time specified in the agreement."

Irrevocable Letter of Credit No. BOK20SDF10510

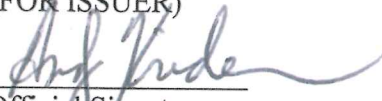
The Bank shall give immediate notice to the permittee and the director of the Department of Environmental Quality of: (a) any notice received or action filed alleging the insolvency or bankruptcy of the bank; or (b) alleging any violations of regulatory requirements which could result in suspension or revocation of the bank's charter or license to do business; or (c) the bank, for any reason, becomes unable to fulfill its obligation under the letter of credit.

It is a condition of this Letter of Credit that it shall be deemed automatically extended without amendment for one year from the present or any future expiration date hereof. This Letter of Credit may be canceled by the financial institution if written notification is provided to the Wyoming Department of Environmental Quality 90 days prior to any future expiration date, and upon receipt of the Director's written consent, which may be granted only when the requirements of the bond have been fulfilled.

All questions arising in connection with this letter of credit shall be determined according to the laws of the state of Wyoming.

This letter of credit is subject to the Uniform Customs and Practice for Documentary Credits, 2007 Revision, International Chamber of Commerce Publication No. 600, except to the extent it is inconsistent with the laws of Wyoming.

Very truly yours,
(FOR ISSUER)


Official Signature

Name: ANDY KRIDER
Title: VP, INTERNATIONAL MANAGER



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

Exhibit B

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 black 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	14-01-44-77
49-019-28155	WINDSOR ENERGY GROUP LLC	STREETER FEDERAL-BG	23-01-44-77
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
49-019-22392	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-EO	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
49-019-21821	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
49-019-27430	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

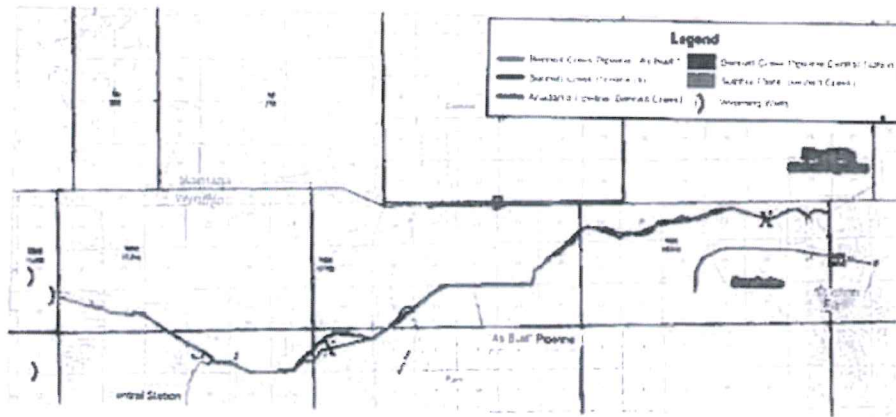
49-019-27446	WINDSOR ENERGY GROUP LLC	JOINSON FEDERAL KC	43-26-44-77
49-019-27447	WINDSOR ENERGY GROUP LLC	JOINSON FED KC	23-26-44-77
49-019-27448	WINDSOR ENERGY GROUP LLC	JOINSON FEDERAL KC	34-26-44-77
49-019-27449	WINDSOR ENERGY GROUP LLC	JOINSON FEDERAL KC	14-26-44-77
49-019-27391	WINDSOR ENERGY GROUP LLC	JOINSON	22-27-44-77BG - KC
49-019-27392	WINDSOR ENERGY GROUP LLC	JOINSON	33-27-44-77BG-KC
49-019-21296	WINDSOR ENERGY GROUP LLC	JOINSON-BG	12-27-44-77
49-019-21297	WINDSOR ENERGY GROUP LLC	JOINSON-BG	23-27-44-77
49-019-21298	WINDSOR ENERGY GROUP LLC	JOINSON	BG 14-27-44-77
49-019-21299	WINDSOR ENERGY GROUP LLC	JOINSON-BG	34-27-44-77
49-019-21300	WINDSOR ENERGY GROUP LLC	JOINSON-BG	41-27-44-77
49-019-21301	WINDSOR ENERGY GROUP LLC	JOINSON-BG	32-27-44-77
49-019-21302	WINDSOR ENERGY GROUP LLC	JOINSON-BG	43-27-44-77
49-019-25878	WINDSOR ENERGY GROUP LLC	JOINSON-KC	12-27-44-77
49-019-25879	WINDSOR ENERGY GROUP LLC	JOINSON-KC	14-27-44-77
49-019-25880	WINDSOR ENERGY GROUP LLC	JOINSON-KC	21-27-44-77
49-019-25881	WINDSOR ENERGY GROUP LLC	JOINSON-KC	23-27-44-77
49-019-25882	WINDSOR ENERGY GROUP LLC	JOINSON-KC	32-27-44-77
49-019-25883	WINDSOR ENERGY GROUP LLC	JOINSON-KC	34-27-44-77
49-019-25884	WINDSOR ENERGY GROUP LLC	JOINSON-KC	41-27-44-77
49-019-25885	WINDSOR ENERGY GROUP LLC	JOINSON-KC	43-27-44-77
49-019-25887	WINDSOR ENERGY GROUP LLC	JOINSON BG-KC	14-28-44-77
49-019-25889	WINDSOR ENERGY GROUP LLC	JOINSON BG-KC	23-28-44-77
49-019-27435	WINDSOR ENERGY GROUP LLC	JOINSON 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	JOINSON FEDERAL KC	12-34-44-77
49-019-27437	WINDSOR ENERGY GROUP LLC	JOINSON FEDERAL KC	13-34-44-77
49-019-27438	WINDSOR ENERGY GROUP LLC	JOINSON FEDERAL KC	21-34-44-77
49-019-27439	WINDSOR ENERGY GROUP LLC	JOINSON FEDERAL KC	23-34-44-77
49-019-27440	WINDSOR ENERGY GROUP LLC	JOINSON FEDERAL KC	34-34-44-77
49-019-27441	WINDSOR ENERGY GROUP LLC	JOINSON FEDERAL KC	41-34-44-77
49-019-27442	WINDSOR ENERGY GROUP LLC	JOINSON 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	12-35-44-77
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 FLP, 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>TSN-R101W</u> Sec 32 SESW	Park	Wyoming	2005	942
Sinclair Oil Corporation, d/b/a Sunlight Ranch Company	Windsor Wyoming LLC	10/14/2004	<u>TSN-R101W</u> Sec 32 W2SE, NESE Sec 33: NWSW, SWNW, E2NW, NWNE	Park	Wyoming	2005	943
The Lardin Company	Windsor Wyoming LLC	5/1/2004	<u>TSN-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>TSN-R101W</u> Sec. 19, Lots 6 & 7, NESW, NWSE, E2SE Sec. 21: N2SW, SENW, S2NE, N2SE	Park	Wyoming	2005	945
WW-160172	Windsor Energy Group, LLC	3/27/2006	<u>TSN-R100W</u> Sec. 20: S2 Sec. 22: S2N2 Sec. 23: S2NW, NESW, NWSE	Park	Wyoming		
			(Lots and Except) <u>TSN-R102W</u> Sec. 32 S2 <u>TSN-R102</u> Sec. 4 NE				

Sugarloaf Gas Plant ROW's

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



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

Exhibit C

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

ADMIN/OUTREACH
(307) 777-7768
FAX 636-1784

ABANDONED MINES AIR QUALITY
(307) 777 145 (307) 777-7391
FAX 636-1784 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



**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

groundwater to concentrations at or below the cleanup levels established in Section V.(B.) of this RA. Performance objectives for [Light Non-Aqueous Phase Liquids] will include recovery of all mobile LNAPL to thickness of <0.01 ft. and as outlined in the remedy documents.”

7. Section XVII of the RA indicates that the “RA shall be satisfied when DEQ issues a certificate of completion or no further action letter in accordance with W.S. § 35-11-1607 or 1608.” Under Section V.K. of the RA, DEQ will only issue a certificate of completion or no further action letter when “the cleanup levels as defined in Section V (B) above have been met... .”
8. Windsor has not yet reduced contaminants of concern in the bedrock aquifer below the levels set forth in Section 5.B. of the RA or recovered all mobile 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.
9. Windsor has also violated the following restrictions, terms, or conditions set forth in the Modification of the RA:
 - A. 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.
 - B. 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.
 - C. 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 operate 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.
10. Wyoming Statute § 35-11-901(a) provides that any person who violates any provision of the Environmental Quality Act, or any rules, standard permit, license, or variance adopted thereunder may be subject to a penalty of up to ten thousand dollars (\$10,000) for each day of violation, a temporary or permanent injunction, or both a penalty and an injunction. Such penalties or injunctive relief may be recovered in a civil action brought by the Attorney General in the name of the People of the State of Wyoming.

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ORDER


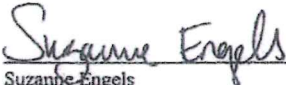
WHEREFORE IT IS HEREBY ORDERED THAT:

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.

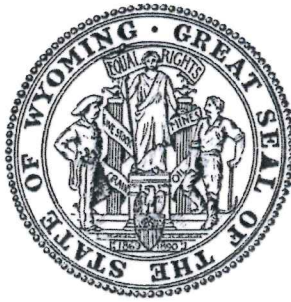
NOTHING IN THE NOTICE shall be interpreted to in any way limit or contravene any other remedy available under the Environmental Quality Act, nor shall this NOV and ORDER be interpreted as being a condition precedent to any other enforcement action.

SIGNED this 15th day of October, 2021

 _____ Todd Parfitt Director Department of Environmental Quality	 _____ Suzanne Engels Administrator Solid and Hazardous Waste Division
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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



Office of the Attorney General

Governor
Mark Gordon

Water and Natural Resources Division
109 State Capitol
Cheyenne, Wyoming 82002
307-777-6946 Telephone
307-777-3542 Fax

Chief Deputy Attorney General
Ryan Schelhaas

Attorney General
Bridget Hill

Division Deputy
James Kaste

November 23, 2021

CERTIFIED MAIL NOs: 7015 1730 0000 0612 and 7015 1730 0000 0629

Attn: Shane Gray
VP, Accounting and Finance
Windsor Energy Group, LLC
14301 Caliber Drive, Suite 200
Oklahoma City, Oklahoma 73134

Attn: Andy Krider
VP, International Manager
BOKF, NA
International Department
One Williams Center - Plaza East
Tulsa, Oklahoma 74172

RE: Notice of Proposed Forfeiture

Dear Mr. Gray and Mr. Krider:

The Wyoming Department of Environmental Quality (Department) is seeking forfeiture of the following financial assurance instrument, pursuant to Wyo. Stat. Ann. § 35-11-504(h) and (j):

Site No.	Bond. No.	Amount	Form of Bond
58.093	BOK20SDF10510	\$341,193.11	Irrevocable Letter of Credit (BOKF, NA)

Windsor Energy Group, LLC is the operator/volunteer for the Crosby 25-3 Natural Gas Well, Voluntary Remediation Program Site No. 58.093. Windsor is responsible for remediation at Site 58.093 under a Remedy Agreement executed on January 16, 2012, and a Modification executed on May 15, 2018. On August 19, 2021, Windsor notified the Department that it was ceasing active business operations in Wyoming. Windsor described Site No. 58.093 as requiring "at least some level of routine action and/or oversight," but confirmed it would not be performing any future operations at this site.

Exhibit D

Windsor Energy Group, LLC
November 23, 2021
Page 2 of 2

On October 15, 2021, the Department issued a Notice of Violation and Order to Windsor, explaining that Windsor had violated restrictions, terms, or conditions of the 2012 Remedy Agreement and the 2018 Modification, including, but not limited to: failure to reduce contaminants of concern in the bedrock aquifer below required levels; failure to provide evidence of groundwater well sampling for 2020 and 2021; and failure to submit a 2020 Annual Report. The Department mailed a copy of this Notice of Violation and Order to BOKF, NA.

Despite the Department's prior notice, Windsor has failed to satisfy its remediation obligations for Site No. 58.093. Accordingly, the Department now seeks to forfeit the financial assurance that Windsor posted to ensure the performance and maintenance of engineering controls and monitoring activities described in the Remedy Agreement and Modification. On November 2, 2021, the Department sought approval from the Wyoming Environmental Quality Council to initiate bond forfeiture proceedings for Site No. 58.093. The Council approved the Department's request on November 16, 2021. The Council's Order of Approval is attached.

The Wyoming Attorney General's Office is hereby notifying you that the Department will seek an order from the Council forfeiting the financial assurance identified in this letter. The Council may order this financial assurance forfeited if you do not make a written demand for a hearing to the Council within thirty days after receiving this notice. If the financial assurance is forfeited, the Department will apply the proceeds to Windsor's remediation obligation.

If you have any questions concerning this matter, please contact me at (307) 777-6199 or matt.vanwormer@wyo.gov.

Sincerely,



Matt Van Wormer,
Senior Assistant Attorney General

cc: Suzanne Engels, Solid and Hazardous Waste Division Administrator
Benjamin Luckey, Hazardous Waste/Voluntary Remediation Program Manager
Jules Feck, Natural Resources Program Principal

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	A. Signature <input checked="" type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee	
1. Article Addressed to: Shane Gray VP, Accounting and Finance Windsor Energy Group, LLC 14301 Caliber Drive, Suite 200 Oklahoma City, Oklahoma 73134	B. Received by (Printed Name)	C. Date of Delivery 11-27
	D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input checked="" type="checkbox"/> No	
2. Article Number (Transfer from service label) 9590 9402 5828 0034 1366 84	3. Service Type <input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail <input type="checkbox"/> Registered Mail Restricted Delivery (\$500)	
	<input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery	
PS Form 3811, July 2015 PSN 7530-02-000-9053		

Domestic Return Receipt

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	A. Signature <input checked="" type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee	
1. Article Addressed to: Andy Kridler, VP International Manager BOKF, NA International Department One Williams Center – Plaza East Tulsa, Oklahoma 74172	B. Received by (Printed Name) Nurce Hulse	C. Date of Delivery 11-29-01
	D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input checked="" type="checkbox"/> No	
2. Article Number (Transfer from service label) 9590 9402 5828 0034 1366 91	3. Service Type <input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail <input type="checkbox"/> Registered Mail Restricted Delivery (\$500)	
	<input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery	
PS Form 3811, July 2015 PSN 7530-02-000-9053		

Domestic Return Receipt