Form **8937**
(December 2017)
Department of the Treasury
Internal Revenue Service

Report of Organizational Actions
Affecting Basis of Securities

▶ See separate instructions.

OMB No. 1545-0123

Part I — Reporting Issuer

1 Issuer's name

PUREWEST ENERGY, LLC AND SUBSIDIARIES FKA UP ENERGY CORPORATION AND SUBSIDIARIES

2 Issuer's employer identification number (EIN)

80-0044296

3 Name of contact for additional information

GINGER SMITH

4 Telephone No. of contact

303-645-9830

5 Email address of contact

IR@PUREWEST.COM

6 Number and street (or P.O. box if mail is not delivered to street address) of contact

1550 WYNKOOP STREET, SUITE 300

7 City, town, or post office, state, and ZIP code of contact

DENVER, CO 80202

8 Date of action

12/15/2021

9 Classification and description

DISTRIBUTION TO HOLDERS OF ISSUER'S CLASS A COMMON UNITS

10 CUSIP number

N/A

11 Serial number(s)

N/A

12 Ticker symbol

N/A

13 Account number(s)

N/A

Part II — Organizational Action   Attach additional statements if needed. See back of form for additional questions.

14 Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action ▶ ON DECEMBER 15, 2021, PUREWEST ENERGY, LLC MADE A CASH DISTRIBUTION TO ITS CLASS A COMMON HOLDERS. THE TOTAL PAYMENT PER UNIT WAS $18.13. THE DATE OF RECORD WAS DECEMBER 6, 2021. THE EX-DIVIDEND DATE WAS DECEMBER 5, 2021.

15 Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis ▶ PUREWEST ENERGY LLC HAS DETERMINED THAT OF THE $18.13 PER UNIT DISTRIBUTION, $ 2.46 (13.56%) IS AN AMOUNT THAT CONSTITUTES A DIVIDEND (AS DEFINED IN SECTION 316) UNDER SECTION 301(c)(1) AND SHOULD BE INCLUDED IN GROSS INCOME; $15.67 (86.44%) IS AN AMOUNT THAT (i) SHOULD BE APPLIED AGAINST AND REDUCE THE ADJUSTED BASIS OF THE UNITS UNDER SECTION 301(c)(2), OR (ii) TO THE EXTENT THAT IT EXCEEDS THE ADJUSTED BASIS IN THE UNITS, SHOULD BE TREATED AS A GAIN FROM THE SALE OR EXCHANGE OF PROPERTY UNDER SECTION 301(c)(3).

16 Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates ▶ THE CALCULATION OF THE CHANGE IN BASIS IS BASED UPON THE PORTION OF DISTRIBUTION THAT IS PAID OUT OF THE CURRENT AND ACCUMULATED EARNINGS AND PROFITS OF PUREWEST ENERGY, LLC. ONCE CURRENT AND ACCUMULATED EARNINGS AND PROFITS REACH $0, THE EXCESS DISTRIBUTION IS TREATED AS AN AMOUNT DESCRIBED UNDER SECTIONS 301(c)(2) AND 301(c)(3).

For Paperwork Reduction Act Notice, see the separate Instructions.

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Part II   **Organizational Action** *(continued)*

17   List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶

301(c) AND 316(a)

18   Can any resulting loss be recognized? ▶ N/A

19   Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶

TAX YEAR ENDING 12/31/2021

Sign Here

Signature ▶ *(signed)*   Date ▶ 1/27/22

Print your name ▶ TY HARRISON   Title ▶ PRESIDENT & CFO

Paid Preparer Use Only				
Print/Type preparer's name MICHAEL OSINA	Preparer's signature *(signed)*	Date 1/27/2022	Check ☐ if self-employed	PTIN P00502854
Firm's name ▶ GRANT THORNTON LLP			Firm's EIN ▶ 36-6055558	
Firm's address ▶ 700 MILAM ST, HOUSTON, TX 77002			Phone no. 832-476-3600	

Send Form 8937 (including accompanying statements) to: Department of the Treasury, Internal Revenue Service, Ogden, UT 84201-0054