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December 19, 2022

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VIA EMAIL (DOJ-CPB@DOJ.NH.GOV)

Attorney General John Formella
Office of the Attorney General
33 Capitol Street
Concord, NH 03301

Re: Incident Notification

Dear Attorney General Formella:

We are writing on behalf of our client, P2 Energy Solutions (“P2 Energy”), to notify your office concerning a cybersecurity incident.

On November 11, 2021, P2 Energy identified suspicious activity on certain computer systems in its network. Upon discovery, P2 Energy initiated its incident response plan and took steps to secure its network. On December 16, 2021, P2 Energy received information that an unauthorized party may have accessed its network. P2 Energy commenced an investigation and cooperated with law enforcement. P2 Energy’s investigation revealed that an unauthorized party accessed and acquired certain files from P2’s network as a result of this incident.

P2 Energy reviewed the contents of the files for personal information. P2 Energy then conducted an investigation to locate contact information for the involved individuals. This process was time and labor-intensive, but P2 Energy wanted to be certain about what information was involved and to whom it pertained. On October 15, 2022, P2 Energy determined that one or more of the files contained the name and Social Security numbers of 35 New Hampshire residents. P2 Energy maintained some of this data while providing services as an agent on behalf of its customers and, if required, notified its customers beginning on November 7, 2022.

Beginning on December 19, 2022, P2 Energy mailed notification letters via First Class mail to the New Hampshire residents. A sample of the notification is enclosed. P2 Energy is offering a complimentary, one-year membership to credit monitoring and identity theft protection services

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through IDX to all notice recipients. P2 Energy has also established a dedicated, toll-free call center that individuals can call to obtain more information regarding the incident.

To reduce the risk of a similar incident from occurring in the future, P2 Energy has implemented additional safeguards and technical security measures to further protect and monitor its systems.

Please do not hesitate to contact me if you have any questions regarding this matter.

Sincerely,

David B. Sherman
Partner

Enclosure



P.O. Box 1907
Suwanee, GA 30024

To Enroll, Please Call:
(833) 814-1790
Or Visit:
<https://response.idx.us/p2es>
Enrollment Code:
<<XXXXXXXXXX>>

<<First Name>> <<Last Name>>
<<Address1>>
<<Address2>>
<<City>>, <<State>> <<Zip>>

December 19, 2022

<<NOTICE OF DATA BREACH>> (CA Only)

Dear << First Name>> <<Last Name >>:

P2 Energy Solutions is committed to protecting the confidentiality and security of the information we maintain. We are writing to notify you that we identified and addressed an incident that involved some of your information. We maintain your information because we provide accounting and land management software services to various customers in the oil and gas industry. This notice explains the incident, measures we have taken, and additional steps you may consider taking in response.

What Happened? We identified suspicious network activity on November 17, 2021. Upon discovery, we initiated our incident response plan, and took proactive steps to secure our network. On December 16, 2021, we received information that an unauthorized party may have accessed our network. We commenced an investigation and determined that an unauthorized party accessed and acquired certain files from our network between November 8, 2021 and November 17, 2021.

What Information Was Involved? P2 reviewed these files to identify the involved individuals. This process was time and labor-intensive, but P2 wanted to be certain about what information was involved and to whom it pertained. On October 15, 2022, we determined that one or more file(s) contained your name and <<variable data>>.

What We Are Doing. We implemented additional security measures to enhance the security of our network and we are continuing to train our employees concerning data security. We also arranged for a company called “IDX” to provide identity monitoring at no cost to you for <<one year/ two years>>. IDX identity protection services include <<one year/ two years>> of credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed identity theft recovery services.

What You Can Do. We encourage you to remain vigilant against the possibility of fraud and identity theft by reviewing your financial account statements and credit reports for any unauthorized activity. If you see charges or activity you did not authorize, please contact the relevant financial institution immediately. You can also sign up for the free credit monitoring services through IDX by calling (833) 814-1790 or going to <https://response.idx.us/p2es> and use the Enrollment Code provided above. Please note the deadline to enroll is March 19, 2023. For more information on identity theft prevention, please see the pages following this letter.

For More Information. If you have any questions, please call (833) 814-1790, Monday through Friday, between 8:00 am and 8:00 pm, Central Time.

Sincerely,

J. Scott Lockhart
Chief Executive Officer

ADDITIONAL STEPS YOU CAN TAKE

We remind you it is always advisable to be vigilant for incidents of fraud or identity theft by reviewing your account statements and free credit reports for any unauthorized activity. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting companies. To order your annual free credit report, please visit www.annualcreditreport.com or call toll free at 1-877-322-8228. Contact information for the three nationwide credit reporting companies is as follows:

- *Equifax*, PO Box 740241, Atlanta, GA 30374, www.equifax.com, 1-800-685-1111
- *Experian*, PO Box 2002, Allen, TX 75013, www.experian.com, 1-888-397-3742
- *TransUnion*, PO Box 2000, Chester, PA 19016, www.transunion.com, 1-800-916-8800

If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Attorney General's office in your state. You can obtain information from these sources about steps an individual can take to avoid identity theft as well as information about fraud alerts and security freezes. You should also contact your local law enforcement authorities and file a police report. Obtain a copy of the police report in case you are asked to provide copies to creditors to correct your records. Contact information for the Federal Trade Commission is as follows:

- *Federal Trade Commission*, Consumer Response Center, 600 Pennsylvania Avenue NW, Washington, DC 20580, 1-877-IDTHEFT (438-4338), www.identitytheft.gov

Fraud Alerts and Credit or Security Freezes:

Fraud Alerts: There are two types of general fraud alerts you can place on your credit report to put your creditors on notice that you may be a victim of fraud—an initial alert and an extended alert. You may ask that an initial fraud alert be placed on your credit report if you suspect you have been, or are about to be, a victim of identity theft. An initial fraud alert stays on your credit report for one year. You may have an extended alert placed on your credit report if you have already been a victim of identity theft with the appropriate documentary proof. An extended fraud alert stays on your credit report for seven years.

To place a fraud alert on your credit reports, contact one of the nationwide credit bureaus. A fraud alert is free. The credit bureau you contact must tell the other two, and all three will place an alert on their versions of your report.

For those in the military who want to protect their credit while deployed, an Active Duty Military Fraud Alert lasts for one year and can be renewed for the length of your deployment. The credit bureaus will also take you off their marketing lists for pre-screened credit card offers for two years, unless you ask them not to.

Credit or Security Freezes: You have the right to put a credit freeze, also known as a security freeze, on your credit file, free of charge, which makes it more difficult for identity thieves to open new accounts in your name. That's because most creditors need to see your credit report before they approve a new account. If they can't see your report, they may not extend the credit.

How do I place a freeze on my credit reports? There is no fee to place or lift a security freeze. Unlike a fraud alert, you must separately place a security freeze on your credit file at each credit reporting company. For information and instructions to place a security freeze, contact each of the credit reporting agencies at the addresses below:

- **Experian Security Freeze**, PO Box 9554, Allen, TX 75013, www.experian.com
- **TransUnion Security Freeze**, PO Box 2000, Chester, PA 19016, www.transunion.com
- **Equifax Security Freeze**, PO Box 105788, Atlanta, GA 30348, www.equifax.com

You'll need to supply your name, address, date of birth, Social Security number and other personal information.

After receiving your freeze request, each credit bureau will provide you with a unique PIN (personal identification number) or password. Keep the PIN or password in a safe place. You will need it if you choose to lift the freeze.

How do I lift a freeze? A freeze remains in place until you ask the credit bureau to temporarily lift it or remove it altogether. If the request is made online or by phone, a credit bureau must lift a freeze within one hour. If the request is made by mail, then the bureau must lift the freeze no later than three business days after getting your request.

If you opt for a temporary lift because you are applying for credit or a job, and you can find out which credit bureau the business will contact for your file, you can save some time by lifting the freeze only at that particular credit bureau. Otherwise, you need to make the request with all three credit bureaus.

P2 Energy Solutions can be contacted via mail at 1331 Lamar, Suite 1400, Houston, TX 77010, Attn: Office of Corporate Counsel, or by telephone at 713-481-2000.

Additional information for residents of the following states:

Connecticut: You may contact and obtain information from your state attorney general at: *Connecticut Attorney General's Office*, 165 Capitol Ave, Hartford, CT 06106, 1-860-808-5318, www.ct.gov/ag

District of Columbia: You may contact and obtain information from your attorney general at: Office of the Attorney General for the District of Columbia, 441 4th Street NW, Washington, DC 20001, 1-202-727-3400, www.oag.dc.gov

Maryland: You may contact and obtain information from your state attorney general at: *Maryland Attorney General's Office*, 200 St. Paul Place, Baltimore, MD 21202, 1-888-743-0023 / 1-410-576-6300, www.oag.state.md.us

New York: You may contact and obtain information from these state agencies: *New York Department of State Division of Consumer Protection*, One Commerce Plaza, 99 Washington Ave., Albany, NY 12231-0001, 518-474-8583 / 1-800-697-1220, <http://www.dos.ny.gov/consumerprotection>; and *New York State Office of the Attorney General*, The Capitol, Albany, NY 12224-0341, 1-800-771-7755, <https://ag.ny.gov>

North Carolina: You may contact and obtain information from your state attorney general at: *North Carolina Attorney General's Office*, 9001 Mail Service Centre, Raleigh, NC 27699, 1-919-716-6000 / 1-877-566-7226, www.ncdoj.gov

Rhode Island: This incident involves **XX** individuals in Rhode Island. Under Rhode Island law, you have the right to file and obtain a copy of a police report. You also have the right to request a security freeze, as described above. You may contact and obtain information from your state attorney general at: *Rhode Island Attorney General's Office*, 150 South Main Street, Providence, RI 02903, 1-401-274-4400, www.riag.ri.gov

West Virginia: You have the right to ask that nationwide consumer reporting agencies place "fraud alerts" in your file to let potential creditors and others know that you may be a victim of identity theft, as described above. You also have a right to place a security freeze on your credit report, as described above.

New Mexico: A Summary of Your Rights Under the Fair Credit Reporting Act. The federal Fair Credit Reporting Act (FCRA) promotes the accuracy, fairness, and privacy of information in the files of consumer reporting agencies. There are many types of consumer reporting agencies, including credit bureaus and specialty agencies (such as agencies that sell information about check writing histories, medical records, and rental history records). Your major rights under the FCRA are summarized below. For more information, including information about additional rights, go to www.consumerfinance.gov/learnmore or write to: Consumer Financial Protection Bureau, 1700 G Street NW, Washington, DC 20552.

- You must be told if information in your file has been used against you.
- You have the right to know what is in your file.
- You have the right to ask for a credit score.
- You have the right to dispute incomplete or inaccurate information.
- Consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information.
- Consumer reporting agencies may not report outdated negative information.
- Access to your file is limited.
- You must give your consent for reports to be provided to employers.

- You may limit “prescreened” offers of credit and insurance you get based on information in your credit report.
- You have a right to place a “security freeze” on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization.
- You may seek damages from violators.
- Identity theft victims and active duty military personnel have additional rights.