

Geraldine N. Sperling  
1266 E. Stuart Ave.  
Fresno, CA. 93710

November 30, 2020

Jim Halvorson  
Montana Board of Oil and Gas Conservation  
2535 St. Johns Ave.  
Billings, Montana 59102  
[jhalvorson@mt.gov](mailto:jhalvorson@mt.gov)

Re: Docket No. 70-2020, Application of A&S Mineral Development Co., LLC to  
change operator from Anadarko Minerals, Inc.

Dear Mr. Halvorson,

I am submitting this letter in objection to the above-referenced application of A&S Mineral Development Co., LLC (A&S) for a change of operator and transfer of plugging and reclamation responsibility for various wells in Valley County, MT, from Anadarko Minerals, Inc. (AMI).

I have a mineral ownership interest in certain of the wells subject to A&S' application and will be directly and adversely affected if the application is approved. Some years ago, AMI's predecessor in interest leased my mineral estate and operated wells pursuant to that oil and gas lease, however, that lease has expired and terminated.

Since AMI no longer has a working interest in my property, or wells located thereon, it cannot transfer the wells to a third party. Moreover, neither it nor any third party may plug and reclaim the wells without my consent and cooperation. I have been able to learn very little about A&S except that it may be a subsidiary of the sovereign nations of the Assiniboine and Sioux Tribes. In any case, I have serious concerns about A&S' experience, ability, and commitment to assume AMI's plugging and reclamation obligations.

Moreover, the little information available to me about the bonding being proposed by A&S leads me to believe that it is insufficient to ensure plugging and reclamation of all 48 wells. I am apprehensive that the wells on my property will not be properly plugged and abandoned nor the lands reclaimed, and that I will have no further recourse against A&S.

AMI and A&S have excluded me from the application process. I only recently learned of it and have not had adequate time to prepare for it. I am an integral party to any plan for the wells located on my property – wells in which AMI no longer owns a working interest. I would greatly appreciate additional time to review and discuss the application with AMI and A&S, and learn about A&S and its plans for the wells. A

December hearing on the application is premature. Therefore, I respectfully request that you continue the application in Docket No. 70-2020 to the February 2021 hearing. Additionally, I respectfully request a more definite and detailed statement of the issues involved in the hearing. Alternatively, I respectfully request that after notice and hearing, the Board of Oil and Gas Conservation deny the application, and order any additional relief deemed necessary and appropriate.

I am available and would be delighted to discuss my concerns at your convenience. Please contact me by phone or email, as follows:

Phone: 559-301-1931  
Email: gnsperling@att.net

Sincerely,



Geraldine N. Sperling