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April 6, 2021

Jim Halvorson
Administrator
Montana Board of Oil and Gas Conservation
2535 St. Johns Avenue
Billings, MT 59102

RE: Docket Nos. 20 and 21-2021 (Sections 12 & 13-T26N-R58E); Docket Nos. 22 and 23-2021 (Sections 18 & 19-T26N-R59E); and Docket No. 24-2021 (Sections 2 & 11-T26N-R9E)

Dear Mr. Halvorson:

I represent Continental Resources, Inc. (hereinafter “Continental”) and draft this letter in protest of the captioned dockets filed by Bison Oil & Gas III, LLC (hereinafter “Bison”). Continental has several issues with the Bison applications. Those issues include, but are not limited to, the following:

For Docket Nos. 20 and 21-2021:

- a. The overlapping temporary spacing unit proposed is irregular spacing compared to the current spacing/production and is not ideal because it will completely disrupt future development plans. Continental has an 18.88% working interest in the spacing unit. The proposed overlapping temporary spacing unit also only includes Section 13 of the currently existing Sections 13 and 24 spacing unit.
- b. One (1) mile laterals have zero economic value, as evidenced by Bison’s exhibits.
- c. An owner with a very low working interest percentage should not be permitted to dictate operations and future development plans.

For Docket Nos. 22 and 23-2021:

- a. The overlapping temporary spacing unit proposed is irregular spacing compared to the current spacing/production and is not ideal because it will completely disrupt future development plans. Continental has a 27.43% working interest in the spacing unit. The proposed overlapping temporary spacing unit also only includes Section 19 of the currently existing Sections 19 and 30 spacing unit.
- b. One (1) mile laterals have zero economic value, as evidenced by Bison’s exhibits.

c. An owner with a very low working interest percentage should not be permitted to dictate operations and future development plans.

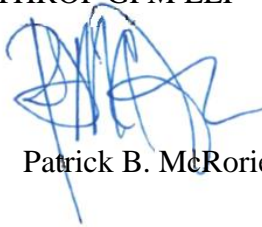
For Docket No. 24-2021:

a. An owner with a very low working interest percentage should not be permitted to dictate operations and future development plans.

Sincerely,

LATHROP GPM LLP

By:



Patrick B. McRorie

cc: Scott Davis, Continental Resources, Inc.
Matt Simmons, Continental Resources, Inc.