

**O'TOOLE LAW FIRM**  
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*Loren J. O'Toole (1930 - 2013)*  
*Loren J. O'Toole II (Larry)*

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March 18, 2021

MONTANA BOARD OF OIL & GAS CONSERVATION  
2535 St. Johns Avenue  
Billings, Montana 59102  
Via Fax (406) 652-5305

BISON OIL & GAS III, LLC  
518 17<sup>th</sup> Street  
Suite 1800  
Denver, Colorado 80202

SLAWSON EXPLORATION COMPANY, INC.  
1675 Broadway  
Suite 1600  
Denver, Colorado 80202

RE: Prima Exploration, Inc.

Dear Folks:

Enclosed is a signed Protest of Application for Permit to Drill by Bison Oil & Gas III, LLC and a signed letter in support of a protest by Slawson.

Sincerely,



Loren J. O'Toole II

LJO:jl

Encs

**RECEIVED**

**MAR 22 2021**

**MONTANA BOARD OF OIL &  
GAS CONSERVATION • BILLINGS**

BEFORE THE BOARD OF OIL AND GAS CONSERVATION OF THE STATE OF MONTANA

RE: PROTEST OF APPLICATION FOR PERMIT TO DRILL BY BISON OIL & GAS III, LLC

COMES NOW, PRIMA EXPLORATION, INC. (herein "Prima") AND FILES THE FOLLOWING PROTEST PURSUANT TO A.R.M. 36.22.601(6):

- (1) Prima's contact information is as follows:

PRIMA EXPLORATION, INC.  
250 Fillmore Street, Suite 500  
Denver, Colorado 80206  
Ph: (303) 755-5681

- (2) Prima has a significant leasehold interest of approximately 17% in the property that comprises the proposed spacing unit located in Roosevelt and Richland Counties as follows:

TOWNSHIP 26 NORTH, RANGE 59 EAST  
Sections 1, 12, and 13

- (3) Prima requests a hearing on the application because Prima has a larger leasehold interest in the proposed temporary spacing unit and plans to operate and drill the wells pursuant to it's pending temporary spacing unit and increased density applications.
- (4) Prima began operating oil and gas wells in the Williston Basin in 1999 and has concerns over Bison's Williston Basin experience as a potential operator.

DATED this 18th day of MARCH, 2021.

By:   
LOREN J. O'TOOLE II  
ATTORNEY FOR PRIMA

CERTIFICATE OF SERVICE

This is to certify that the foregoing was duly served by mail upon the following parties of record at their respective addresses on the 18th day of MARCH, 2021

By:   
LOREN J. O'TOOLE II

MONTANA BOARD OF OIL & GAS CONSERVATION  
2535 St. Johns Avenue  
Billings, Montana 59102  
Via Fax (406) 655-6015 and First Class Mail

BISON OIL & GAS III, LLC  
518 17<sup>th</sup> Street  
Suite 1800  
Denver, Colorado 80202

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**MAR 22 2021**

**MONTANA BOARD OF OIL &  
GAS CONSERVATION • BILLINGS**

March 15, 2021

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

c/o Slawson Exploration Company, Inc.  
1675 Broadway, Suite 1600  
Denver, CO 80202

RE: Support of Operator – Citadel PSU

It has come to the attention of Prima Exploration, Inc. (“Prima”) that Bison Oil and Gas III, LLC (“Bison”) submitted Docket No. 24-2021 to the Montana Board of Oil and Gas Conservation (the “Board”) applying to authorize the drilling of two additional horizontal Bakken/Three Forks formation wells in the following Permanent Spacing Unit (“Citadel PSU”) operated by Slawson Exploration Company, Inc. (“Slawson”):

Township 26 North, Range 59 East, M.P.M  
Section 2: All;  
Section 11: All;  
Roosevelt County, Montana

As a working interest owner in the Citadel 2-11-2H, API No. 25-85-21806 (the “Well”) since 2011, Prima is familiar with Slawson’s capabilities and experience operating the Well and Citadel PSU.

Prima has concerns and reservations regarding more than one operator conducting operations in the Citadel PSU. Prima believes that Slawson, as operator of the Well, is best qualified to develop the Citadel PSU in an orderly and geologically driven manner that will promote maximum efficient recovery, protect correlative rights, and prevent waste.

Accordingly, Prima Exploration, Inc., as the owner of 1.190817% working interest in the Citadel PSU, does hereby support Slawson as the sole operator of the Citadel PSU and requests that the Board deny Bison’s applications for permits to drill submitted under Docket 24-2021.

Respectfully,

Prima Exploration, Inc.  
250 Fillmore Street, Suite 500  
Denver, Colorado 80206  
Ph: (303) 755-5681

By:   
LOREN J. O'TOOLE II  
ATTORNEY FOR PRIMA EXPLORATION, INC.

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MAR 22 2021

MONTANA BOARD OF OIL &  
GAS CONSERVATION • BILLINGS

CERTIFICATE OF SERVICE

This is to certify that the foregoing was duly served by mail upon the following parties of record at their respective addresses on the 18th day of MARCH, 2021

By: 

LOREN J. O'TOOLE II

MONTANA BOARD OF OIL & GAS CONSERVATION  
2535 St. Johns Avenue  
Billings, Montana 59102  
Via Fax (406) 655-6015 and First Class Mail

BISON OIL & GAS III, LLC  
518 17<sup>th</sup> Street  
Suite 1800  
Denver, Colorado 80202

SLAWSON EXPLORATION COMPANY, INC.  
1675 Broadway, Suite 1600  
Denver, Colorado 80202

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**MAR 22 2021**

**MONTANA BOARD OF OIL &  
GAS CONSERVATION • BILLINGS**