



Docket No. 24-2021

Upon the application of **Bison Oil and Gas III, LLC** to amend Board Order 224-2012 to authorize the drilling of up to three additional horizontal Bakken/Three Forks Formation wells from a common pad anywhere within the permanent spacing unit comprised of all of Sections 2 and 11, T26N-R59E, Roosevelt County, Montana, but not closer than 200' (heel/toe setback) and 500' (lateral setback) to the exterior boundaries thereof.

Docket No. 56-2021

Upon the application of **Bison Oil and Gas III, LLC** for permits to drill three horizontal Bakken/Three Forks formation wells in Sections 2 and 11, T26N-R59E, Roosevelt County, Montana. **Slawson Exploration Company, Inc.** has filed protest of these applications in accordance with A.R.M. 36.22.601 based on published notice in the Sidney Herald and the Helena Independent Record on March 10, 2021, April 25, 2021, and May 9, 2021

**BEFORE THE
DEPARTMENT OF NATURAL RESOURCES
AND CONSERVATION
BOARD OF OIL & GAS CONSERVATION
OF THE STATE OF MONTANA**

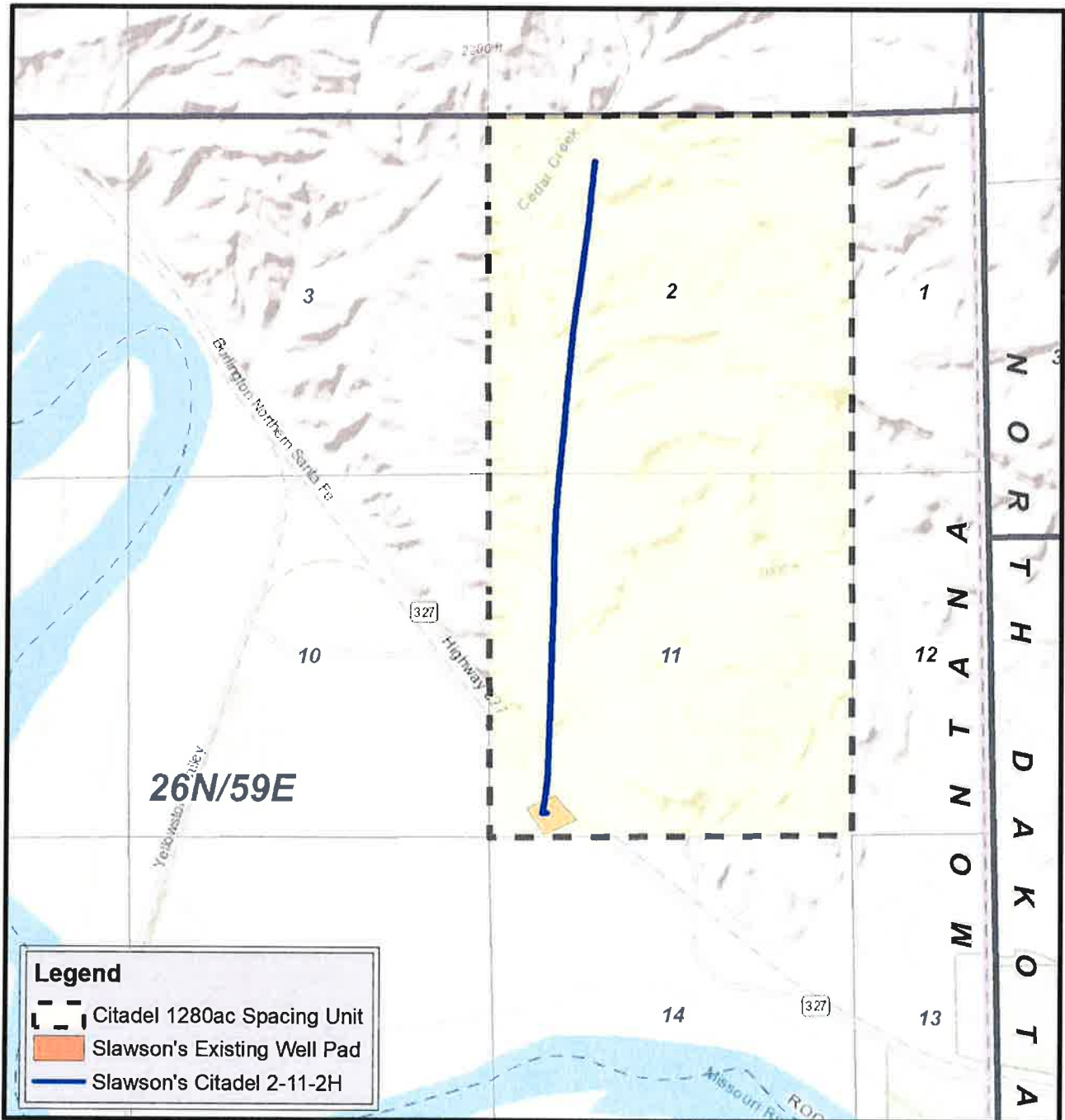
June 10th, 2021

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Location Map
Citadel Permanent Spacing Unit
Roosevelt County, Montana

Township 26 North, Range 59 East, M.P.M.
Sections 2 & 11 (1,280.84 acres)



Leasehold Ownership Breakdown

| Owner | WI |
|---|----------------|
| Slawson Exploration Company, Inc. | 41.20% |
| Non-Op Supporters | <u>53.02%</u> |
| Slawson + Supporters ("Slawson Group") | 94.22% |
| Other Owners (15 Total) | 5.49% |
| Bison Oil & Gas III, LLC | <u>0.29%</u> |
| Total | 100.00% |



Letters of Support from Non-Op Owners



March 17, 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 Riverbend Oil & Gas VI, LLC (“Riverbend”) 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 2017, Riverbend is familiar with Slawson’s capabilities and experience operating the Well and Citadel PSU.

Riverbend has concerns and reservations regarding more than one operator conducting operations in the Citadel PSU. Riverbend 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, Riverbend Oil & Gas VI, LLC, as the owner of 34.851870% 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,

Riverbend Oil & Gas VI, LLC

By: 

Name: COLIN BARNETT

Title: W Land

Date: 3-17-21

Cimarex Energy Co.
1700 Lincoln Street
Suite 3700
Denver, Colorado 80203-4518



March 17, 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 Cimarex Energy Company (“Cimarex”) 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, Cimarex is familiar with Slawson’s capabilities and experience operating the Well and the Citadel PSU.

Cimarex has concerns and reservations regarding more than one operator conducting operations in the Citadel PSU. Cimarex 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, Cimarex Energy Company, as the owner of 9.284312% 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,

Cimarex Energy Company

By:  _____

Name: Darren J. Lay

Title: Vice President – Business Development

Date: March 17, 2021



March 17, 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 Equinor Energy LP (“Equinor”) 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, Equinor is familiar with Slawson’s capabilities and experience operating the Well and Citadel PSU.

Equinor has concerns and reservations regarding more than one operator conducting operations in the Citadel PSU. Equinor 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, Equinor Energy LP, as the owner of 4.570705% 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,

Equinor Energy LP

By:
Name: Eric Luszc
Title: Area Land Manager
Date: 3/17/21

March 17, 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 Grayson Mill Energy, LLC (“Grayson Mill”) 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”) in Roosevelt County, Montana.

Township 26 North, Range 59 East, M.P.M

Section 2: All

Section 11: All

Grayson Mill recently executed an agreement to purchase all right, title and interest of Equinor Energy LP (“Equinor”) in the Citadel PSU including the Citadel 2-11-2H (the “Well”) and is familiar with Slawson’s capabilities and experience operating the Well and the Citadel PSU. Grayson Mill has concerns and reservations regarding more than one operator conducting operations in the Citadel PSU. Grayson Mill 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, Grayson Mill Energy, LLC, as the pending owner of 4.570705% working interest (as successor to Equinor) 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,
Grayson Mill Energy, LLC



Deward W. Gerdom Jr.

VP, Business Development

March 17, 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 Northern Oil and Gas, Inc. (“Northern”) 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 2015, Northern is familiar with Slawson’s capabilities and experience operating the Well and Citadel PSU.

Northern has concerns and reservations regarding more than one operator conducting operations in the Citadel PSU. Northern 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, Northern Oil and Gas, Inc., as the owner of 3.122951% 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,

Northern Oil and Gas, Inc.

By: 
Name: Adam Dillman
Title: COO
Date: 3/17/21

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

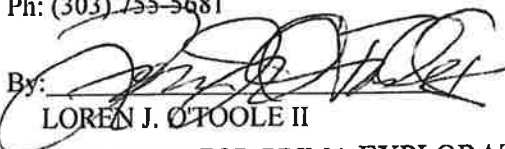
As a working interest owner in the Citadel 2-11-2H, API No. 25-85-21806 (the “Well”) since 2011, Prima is familiar with Slawson’s capabilities and experience operating the Well and Citadel PSU.

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.

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 17th Street
Suite 1800
Denver, Colorado 80202

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

Letters from MT Operators to the MBOGC



Kraken Oil & Gas

9805 Katy Freeway – Ste.300, Houston, TX 77024

June 8, 2021

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

RE: Consideration of Contested Drilling Permits

It has come to the attention of Kraken Oil & Gas LLC (“**Kraken**”) that Bison Oil and Gas III, LLC (“**Bison**”) submitted a number of applications that will be heard at the June 10, 2021 meeting of the Montana Board of Oil & Gas Conservation (“**MTBOGC**”). Among other things, Bison is requesting the ability to permit new wells in an existing Permanent Spacing Unit (“**PSU**”) currently operated by Slawson Exploration Company, Inc. (“**Slawson**”).

Kraken is the largest producer of Bakken oil in the state of Montana, and has been the most active operator in the state since 2016, completing 52 of the 55 new wells drilled during that timeframe. As a large operator in the state of Montana, Kraken supports orderly development that will promote maximum efficient recovery, protect correlative rights and prevent waste.

In this particular instance, Kraken supports Slawson’s protest regarding Docket No. 56-2021 and believes there should not be competing operators drilling and operating within the same PSU, especially in circumstances where one operator represents the clear majority of the leasehold interest.

As we have done for many years, we look forward to continue working with the MTBOGC on the development of our oil & gas interests in Montana, and appreciate your time and consideration of our view regarding this matter.

Respectfully,

Kraken Oil & Gas LLC

Bruce Larsen, President & CEO



June 7, 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: Docket No. 56-2021
Support of Slawson's Protest**

It has come to the attention of White Rock Oil & Gas ("WROG") that Bison Oil and Gas III, LLC ("Bison") submitted three applications for permit to drill ("APDs") pursuant to the Notice of Intention to Apply for Permit to Drill Oil and Gas Well, in the Sidney Herald on March 10, 2021, April 25, 2021, and May 9, 2021. The APDs are for three horizontal Bakken/Three Forks formation wells to be drilled in a Permanent Spacing Unit ("PSU") operated by Slawson Exploration Company, Inc. ("Slawson").

As an operator in Montana with existing PSUs, WROG has significant concerns and reservations regarding an operator with such a low working interest percentage conducting operations in an existing PSU.

Accordingly, WROG wishes to indicate its support for Slawson's protest regarding Docket No. 56-2021.

Respectfully,

INSERT FULL COMPANY NAME

By: 

Name: Brett Keener

Title: Vice President of Operations

Date: 06/09/2021



Paul Boland
Land Manager, Denver Division

EOG Resources, Inc.
600 17th Street, Suite 1000N
Denver, CO 80202
(303) 262-2850
Paul_Boland@eogresources.com

June 8, 2021

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

RE: Docket No. 56-2021
Support of Slawson's Protest

It has come to the attention of EOG Resources, Inc. ("EOG") that Bison Oil and Gas III, LLC ("Bison") submitted three applications for permit to drill ("APDs") pursuant to the Notice of Intention to Apply for Permit to Drill Oil and Gas Well, in the Sidney Herald on March 10, 2021, April 25, 2021, and May 9, 2021. The APDs are for three horizontal Bakken/Three Forks formation wells to be drilled in a Permanent Spacing Unit ("PSU") operated by Slawson Exploration Company, Inc. ("Slawson").

As an operator in Montana with existing PSUs, EOG has significant concerns and reservations regarding more than one operator conducting operations in an existing PSU.

EOG believes that in order to develop a PSU in an orderly and geologically driven manner that will promote maximum efficient recovery, protect correlative rights, and prevent waste, there should not be competing operators drilling and operating within the same PSU.

Accordingly, EOG wishes to indicate its support for Slawson's protest regarding Docket No. 56-2021.

Respectfully,

EOG Resources, Inc.

By: 

Paul Boland
Agent and Attorney-in-Fact

PETRO-HUNT, L.L.C.



P.O. Box 935
Bismarck, ND 58502-0935
Phone: (701) 255-5666 FAX: (701) 258-1562
Email: jherman@petrohunt.com

June 7, 2021

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

RE: Contested Cases – June 10, 2021 Docket

It has come to the attention of Petro-Hunt, LLC (PHLLC) that Bison Oil and Gas III, LLC (Bison) has submitted numerous applications to the Montana Board of Oil and Gas Conservation (MBOGC) requesting permits to drill new wells in existing permanent spacing units operated by third parties. These cases are on the June 10, 2021 docket and are being protested by the third parties currently operating these existing permanent spacing units.

PHLLC is one of top exploration and production companies in the Williston Basin and has been active in the State of Montana since the 1950s. PHLLC currently operates 38 wells, has over 56,000 net acres under lease, and participated in 37 non-operated wells in the State of Montana. As such, PHLLC has a vested interested in the outcome of these contested cases.

PHLLC favors common sense development and regulation that protects correlative rights and prevents waste. PHLLC has significant concerns and reservations regarding more than one operator conducting operations in an existing permanent spacing unit.

Accordingly, PHLLC opposes Bison's actions in these contested cases and encourages the MBOGC to deny these applications and prevent competing operators drilling and operating within the same permanent spacing units.

Sincerely,

A handwritten signature in blue ink that reads 'Jeff Herman'.

Jeff Herman
Region Manager



Lathrop GPM LLP
lathropgpm.com

1515 Wynkoop Street, Suite 600
Denver, CO 80202
Main: 720.931.3200

Patrick B. McRorie
Partner
patrick.mcorie@lathropgpm.com
720.931.3226

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.

Montana Board of Oil and Gas Conservation
April 6, 2021
Page 2

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.



Drew J. Brown
Manager, Gulf Coast & Rockies Land
925 N. Eldridge Pkwy
Houston, Texas 77079
832-486-3193

June 3, 2021

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

Re: Policy Recommendations for Contested Drilling Permits

It has come to the attention of Burlington Resources Oil & Gas Company LP ("**Burlington**") that Bison Oil & Gas III, LLC submitted a number of applications to the Montana Board of Oil and Gas Conservation ("**MBOGC**") requesting, among other things, permits to drill new wells in existing spacing units. Burlington is also aware that several of these applications are being protested by the current operators of these existing spacing units.

Burlington owns approximately five million net acres of oil & gas minerals and seventy-two thousand net acres of leasehold in the state of Montana. As both a large mineral owner and operator in the state of Montana, Burlington supports orderly development that will promote maximum efficient recovery, protect correlative rights, and prevent waste.

Therefore, Burlington respectfully recommends that the MBOGC utilizes criteria in alignment with North Dakota Administrative Code *43-02-03-16.2. Revocation and Limitation of Drilling Permits*, including the weight given to majority working interests when determining the outcome of a contested drilling permit.

Thank you for your consideration.

Respectfully,

Burlington Resources Oil & Gas Company LP

A handwritten signature in blue ink, appearing to read "Drew J. Brown". The signature is stylized with a large, sweeping initial "D" and "J".

Drew J. Brown

Attachment: NDAC 43-02-03-16.2

NDAC 43-02-03-16.2. REVOCATION AND LIMITATION OF DRILLING PERMITS.

1. After notice and hearing, the commission may revoke a drilling, recompletion, or reentry permit or limit its duration. The commission may act upon its own motion or upon the application of an owner in the spacing or drilling unit. In deciding whether to revoke or limit a permit, the factors that the commission may consider include:
 - a. The technical ability of the permitholder and other owners to drill and complete the well.
 - b. The experience of the permitholder and other owners in drilling and completing similar wells.
 - c. The number of wells in the area operated by the permitholder and other owners.
 - d. Whether drainage of the spacing or drilling unit has occurred or is likely to occur in the immediate future and whether the permitholder has committed to drill a well in a timely fashion.
 - e. Contractual obligations such as an expiring lease.
 - f. The amount of ownership the permitholder and other owners hold in the spacing or drilling unit. If the permitholder is the majority owner in the unit or if its interest when combined with that of its supporters is a majority of the ownership, it is presumed that the permitholder should retain the permit. This presumption, even if not rebutted, does not prohibit the commission from limiting the duration of the permit. However, if the amount of the interest owned by the owner seeking revocation or limitation and its supporters are a majority of the ownership, the commission will presume that the permit should be revoked.

Rationale for Protest to Bison Application

Elected Operatorship

- Slawson has been elected as the operator of the Citadel PSU by at least 94.22% WI owners.
- Bison owns 0.29% WI.

Operator's Expertise and Stability

- Slawson has drilled wells in MT since 1979, drilled its first HZ well in the Williston Basin in 1989, and has drilled over 500 HZ wells.
- Slawson has no debt, shareholders, or outside equity backers.

Race to Permit

- Investments are made by operators and non-op owners under the belief that there is a sole operator of a PSU.
- "First to File" regardless of operatorship status would result in a flood of speculative permits as well as protective permits, resulting in an uncertain investment environment.

Prudent Development

- Conflicting development strategies by competing operators would result in numerous contested Board hearings.
- There are no setbacks within a PSU. Competing development within a PSU will negatively impact economic returns, life and EUR of each well, and correlative rights of all owners.

Rationale for Protest to Bison Application (Continued)

Drainage Wars

- Competing operatorship would result in unnecessary spending by each operator to protect against drainage from the other operator's wells.

Marketing Products

- Pipeline dedications are made based on existing and future wells to assure investment from the pipeline company.
- Uncertainty for pipeline companies would result in higher costs, underinvestment, and unnecessary flaring.

Surface Disturbance

- Sole operatorship of a PSU minimizes surfaces disturbance by utilizing the fewest surface locations, ROWs, and pipeline infrastructure.