



November 1, 2024

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

Attn: Mr. John Gizicki
UIC Program Manager

RE: Application for UIC Permit and Authorization to Drill a Class II Injection Well
Location of proposed Disposal Well & Facility: Scadden 1 SWD
NE ¼ NW ¼, Section 21, Township 30N, Range 59E. P.M.M.
Roosevelt County, Montana

Dear Mr. Gizicki,

Phoenix Operating LLC (Phoenix) respectfully submits this application for an Underground Injection Control (UIC) permit for the referenced location and as described in the attached application. A check in the amount of \$150.00 is included in this application submittal, Check #27947.

Phoenix has provided notice to the appropriate parties within ¼ mile area of review of the proposed well location and requests that the application be placed on the docket for the MBOGC hearing scheduled December 5, 2024. A public legal notice will be published in the Helena Independent Record and the Northern Plains Independent upon confirmation of the scheduled docket date, and evidence and proof of publication will be supplemented to MBOGC upon receipt.

If you have any questions concerning the enclosed application, please contact myself at (435) 789-1017 or to Mark Johnson with Phoenix Operating LLC at (303) 548-1953.

Sincerely,

Mark Johnson
EVP Land/Regulatory/HSE
Phoenix Operating LLC

Amy Doebele
Authorized Agent for Phoenix Operating LLC
UELS, LLC

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NOV 01 2024

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

211-2024



October 30, 2024

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

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Attn: Mr. John Gizicki
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Sincerely,

Amy Doebele
Authorized Agent for Phoenix Operating LLC
UELS, LLC

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OCT 30 2024

FORM NO. 22 R 10/09 SUBMIT IN QUADRUPPLICATE TO: ARM 36.22.307 ARM 36.22.601

MONTANA BOARD OF OIL AND GAS CONSERVATION 2535 ST. JOHNS AVENUE, BILLINGS, MONTANA 59102

Lease Name: SCADDEN

MONTANA BOARD OF OIL & GAS CONSERVATION - BILLINGS

Lease Type (Private/State/Federal): PRIVATE

Application for Permit To: Drill [x] Deepen [] Re-enter [] Oil [] Gas [] Other SWD [x]

Well Number: 1 SWD

Operator: PHOENIX OPERATING LLC Address: 4643 S ULSTER STREET, SUITE 1510 City: DENVER State: CO Zip: 80237 Telephone Number: 855-868-4244

Field Name or Wildcat: WILDCAT - ROOSEVELT COUNTY

Unit Name (if applicable):

Surface Location of Well (quarter-quarter and footage measurements): 450' FNL, 2036' FEL, NENW, 21, T30N, R59E

Objective Formation(s): INYAN KARA

Proposed Total Depth and Bottom-hole Location(s) if directional or horizontal well: 5811' MD, TVD

Township, Range, and Section: T30N, R59E, SECTION 21

County: ROOSEVELT

Elevation (indicate GL or KB): 2460 GL

Size and description of drilling/spacing unit and applicable order, if any: Formation at total depth: INYAN KARA Anticipated Spud Date: 3/1/2025

Table with 7 columns: Hole Size, Casing Size, Weight / Foot, Grade (API), Depth, Sacks of Cement, Type of Cement. Rows include data for hole sizes 13.5, 8.75, and 6.

Describe Proposed Operations: Describe or attach labeled diagram of blowout preventer equipment. Indicate if air drilled or describe mud program. SEE ATTACHMENTS FOR DETAILS PHOENIX OPERATING LLC REQUESTS A VARIANCE TO RUN OPEN HOLE LOGS ON THE SUBJECT WELL.

BOARD USE ONLY Approved (date) Permit Fee By Check Number Title Permit Expires Permit Number THIS PERMIT IS SUBJECT TO THE CONDITIONS OF APPROVAL STATED ON THE BACK API Number: 25 -

The undersigned hereby certifies that the information contained on this application is true and correct: Signed (Agent) AUTHORIZED AGENT Date 10/28/2024 Telephone Number 435-789-1017

Samples Required: NONE ALL FROM feet to feet Core chips to address below, full cores to USGS, Core Laboratory, Arvada, CO. Required samples must be washed, dried and delivered prepaid to: Montana Board of Oil and Gas Conservation 2535 St. Johns Avenue Billings, MT 59102

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SUPPLEMENTAL INFORMATION

MONTANA BOARD OF OIL & GAS CONSERVATION • BILLINGS

Note: Additional information or attachments may be required by Rule or by special request.

1. Attach a survey plat certified by a registered surveyor. The survey plat must show the location of the well with reference to the nearest lines of an established public survey.
2. Attach an 8 1/2 x 11" photocopy of that portion of a topographic map showing the well location, the access route from county or other established roads, residences, and water wells within a 1/2 mile radius of the well.
3. Attach a sketch of the well site showing the dimensions and orientation of the site, the size and location of pits, topsoil stockpile, and the estimated cut/fill at the corners and centerstake. (Note: the diagram need not be done by an engineer or surveyor). Attach a sketch of a top view and two side views of the reserve pit(s), if utilized. The reserve pit sketch must show the length, width, depth, cut and fill, amount of freeboard, area of topsoil stockpile, and the height and width of berms.
4. Describe the type and amount of material or liner, if any, to be used to seal the reserve pit. If a synthetic liner is used, indicate the liner thickness (mils), bursting strength, tensile strength, tear strength, puncture resistance, hydrostatic resistance, or attach the manufacturer's specifications.
5. Describe the proposed plan for the treatment and/or the disposal of reserve pit fluids and solids after the well is drilled. If the operator intends to dispose of or treat the reserve pit contents off-site, specify the location and the method of waste treatment and disposal. (Note: The operator must comply with all applicable federal, state, county, and local laws and regulations with regard to the handling, transportation, treatment, and disposal of solid wastes.)
6. Does construction of the access road or location, or some other aspect of the drilling operation require additional federal, state, or local permits or authorizations? If yes, indicate the type of permit or authorization required:
 - No additional permits needed
 - 310 Permit (apply through county conservation district)
 - Air quality permit (apply through Montana Department of Environmental Quality)
 - Water discharge permit (apply through Montana Department of Environmental Quality)
 - Water use permit (apply through Montana Department of Natural Resources and Conservation)
 - Solid waste disposal permit (apply through Montana Department of Environmental Quality)
 - State lands drilling authorization (apply through Montana Department of Natural Resources and Conservation)
 - Federal drilling permit (specify agency)
 - Other federal, state, county, or local permit or authorization: (specify type) _____

NOTICES:

1. Date and time of spudding must be reported to the Board verbally or in writing within 72 hours after the commencement of drilling operations.
2. The operator must give notice of drilling operations to the surface owner as required by Section 82-10-503, MCA, before the commencement of any surface activity.

BOARD USE ONLY

CONDITIONS OF APPROVAL

The operator must comply with the following condition(s) of approval:

WARNING: Failure to comply with conditions of approval may void this permit.

UELS, LLC

MONTANA BOARD MONTANA BOARD OF OIL & GAS CON 0023785

10/28/2024

27947

REFERENCE	INVOICE NUMBER	INV DATE	INVOICE AMOUNT	ADJUSTMENT	DISCOUNT	WRITE OFF	NET AMOUNT PAID
0027779	PHOENIX-SCADDEN1.SWD	10/28/2024	\$150.00	\$150.00	\$0.00	\$0.00	\$150.00
			\$150.00	\$150.00	\$0.00	\$0.00	\$150.00

THIS CHECK IS VOID WITHOUT A BLUE & RED BACKGROUND AND A WATERMARK - HOLD UP TO THE LIGHT TO VERIFY



UELS, LLC
85 South 200 East
Vernal, UT 84078

ZIONS FIRST NATIONAL BANK
VERNAL OFFICE 3 WEST MAIN
VERNAL, UT 84078

31-5/1240

27947

DATE	10/28/2024
AMOUNT	\$150.00

PAY ONLY **150.00** CENTS

PAY One Hundred Fifty Dollars and 00 Cents

TO THE ORDER OF

MONTANA BOARD OF OIL & GAS CON
2535 ST. JOHNS AVENUE
BILLINGS MT 59102

[Handwritten Signature]

CHECK IS PRINTED ON SECURITY PAPER WHICH INCLUDES A MICROPRINT BORDER & FLUORESCENT FIBERS

⑈027947⑈ ⑆124000054⑆002246551⑈

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MONTANA BOARD OF OIL & GAS CONSERVATION • BILLINGS

**State of Montana
Board of Oil & Gas**

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

**Docket No: _____
Underground Injection Control Application**

**Scadden 1 SWD
Section 21, T30N, R59E**

**Phoenix Operating LLC
December 5, 2024**

Phoenix Operating LLC
SCADDEN PAD
SHL: 450' FNL & 2036' FEL
NENW, SECTION 21, T30N, R59E P.M.M.
ROOSEVELT COUNTY, MONTANA

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MONTANA BOARD OF OIL &
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The following is submitted in support of our application to permit the drilling and completion of the Scadden 1 SWD well for the purposes of water injection into the Dakota Group and related rocks within the proposed Wildcat field, Roosevelt County, as required by rule 36.22.1403 of the Rules and Regulations of the Montana Board of Oil & Gas Conservation.

UIC PERMIT APPLICATION

1(a) Location:

The Scadden 1 SWD well has been proposed for the drilling and completion of a water injection well within the Wildcat field in Roosevelt County, Montana as described below. Attachment I depicts the surface hole location and a quarter ¼-mile radius representing the area of review (AOR) for this vertical well.

1(b) Well Location Description:

The Scadden 1 SWD well is a proposed disposal well located in Section 21, T30N, R59E, P.M.M. in Roosevelt County Montana. The surface ownership of this well site is located on Fee/Fee and is owned by Dale & Jodi & Dean Nelson.

1(c) Maps of Wells/Area of Review:

There are currently no oil and gas wells within the ¼-mile AOR. Phoenix is currently drilling three (3) horizontal oil wells at this location with another three (3) to be drilled in the 3rd quarter of 2025

1(d) Location of all Pipelines:

The Scadden 1 SWD surface facilities will be constructed on the same pad as the injection well. Injection fluids will come from the oil wells both being currently drilled and proposed for this location. The Scadden 1 SWD may be tied into Phoenix's pending saltwater gathering system in the future.

1(e) Area Producing Formations, Fresh Water Aquifers and Water Well information:

The Three Forks (Bakken) formation is not currently being produced within the quarter mile AOR of the proposed Scadden 1 SWD. Operator anticipates the Three Forks (Bakken) to produce between 10,200' and 10,287' when currently drilling wells on the Scadden pad are POL.

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Fresh water well data was obtained from the Montanan Department of Natural Resources and Conservation, Water Resources, Division. There is one water well within the ¼ -mile AOR of the proposed injector. The Picard Eldon (ID #42395) which has a depth of 121'.

<u>Location</u>	<u>S-T-R</u>	<u>Well ID</u>	<u>Well Name</u>	<u>Depth</u>
SENW	21-30N-59E	42395	Picard Eldon	121'

Any potential USWDs are protected from the proposed injection zone by surface casing set at 2,300' and cemented to the surface. A production tubing string and an injection packer will result in further isolation of fresh USWDs from injected fluids.

1(f) Name and Geological Description of Injection Zone:

Injection Zone:

The Inyan Kara within the Lower Cretaceous Dakota Group is roughly 517' thick based on the Ronning 23-21 (25-085-21510). The Inyan Kara formation consists of alternating fluvial deltaic sandstones, siltstones and shales. There are several porosity intervals between 5,332' and 5,849' TVD with sandstone packages ranging in thickness from 4' to 40'.

Upper Confining Zone:

The Mowry formation within the lower Cretaceous Dakota Group is made up of shales and bentonitic claystone of offshore marine origin. The Mowry is expected between 4,896' TVD and 5,331' TVD and is approximately 435' thick and overlies the Inyan Kara. The Mowry confines the upper boundary for the Inyan Kara.

Lower Confining Zone:

The Jurassic Swift formation lies conformably below the Inyan Kara. The Swift is made up of shallow marine shale and siltstone and is approximately 482' thick in this area. The Swift is expected at a depth of 5,841' TVD through 6,323' TVD. The Swift confines the lower boundary for the Inyan Kara.

All TVD depths are based on a 15' KB rig.

The offset wells did not have porosity logs for the shallow section but clean GR and low resistivity equates to porosity in the Inyan Kara Formation.

1(g) Open Hole Logs:

The Scadden 1 SWD will be a new drill SWD. The logging program will consist of a CBL-VDL-GR-CCL log ran from TD to Surface, along with Triple Combo + MWD-GR log ran from the base of surface casing to surface. Any logs and test data run on the Scadden 1 SWD will be supplied to the MBOGC.

OCT 30 2024

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS**1(h) Description of Wellbore Construction:**

Attached to this document is the MBOGC's Form 2 and wellbore configuration, requesting drilling and completing of the subject well as an SWD. Appendix V shows the proposed wellbore design. Perforations will be selected after logs are run. Section 6 of the Drilling Plan describes the plan for drilling and completion for the subject well. The Dakota Group perforations will be acidized with 15% HCl and rock salt or polymer diverter at the wellhead during stimulation.

1(i) Description of Injection Fluid:

The Scadden 1 SWD will be used to inject produced water from Phoenix operated wells producing from the Three Forks (Bakken) formation drilled on the well pad. See Appendix VIII, which represents a water analysis from a Bakken well in the area that will be injected at the Scadden 1 SWD. Due to limited Three Forks (Bakken) produced water availability within the area of review, Phoenix Operating LLC proposes to utilize produced water collected from a nearby producing well as the source water for injection. Samples were collected from the Milloy 10-3-24 #2H well, located NENE, Section 15, T155N, R104W, Williams County, North Dakota approximately 7 miles South.

Average and maximum daily volumes of injected water are expected to be 17,500 bbls per day and 20,000 bbls per day respectively, depending on production from wells, storage capabilities of the facility, and final maximum allowable injection pressure (MAIP).

Surface injection pressures will not be allowed to exceed a maximum based on the EPA accepted fracture grading of 0.733 psi/ft and the following equation:

$$\text{MAIP} = (\text{FG}) * (\text{D}_{\text{Top}}) - (\text{SG}) * (\text{NPG}) * (\text{D}_{\text{Top}})$$

- MAIP = Maximum allowable injection pressure
- FG = Assumed fracture gradient in Confining Zone – Shale = 0.8 psi/ft
- SG = Specific Gravity of injection fluid = 1.21
- NPG = Normal pressure gradient = 0.433 psi/ft
- D_{Top} = Depth to top of the injection zone = 5,332'

$$\text{MAIP} = (0.8 \text{ psi/ft} * 5,332 \text{ ft}) - (1.21 * 0.433 \text{ psi/ft} * 5,332 \text{ ft}) = 1,472 \text{ psi}$$

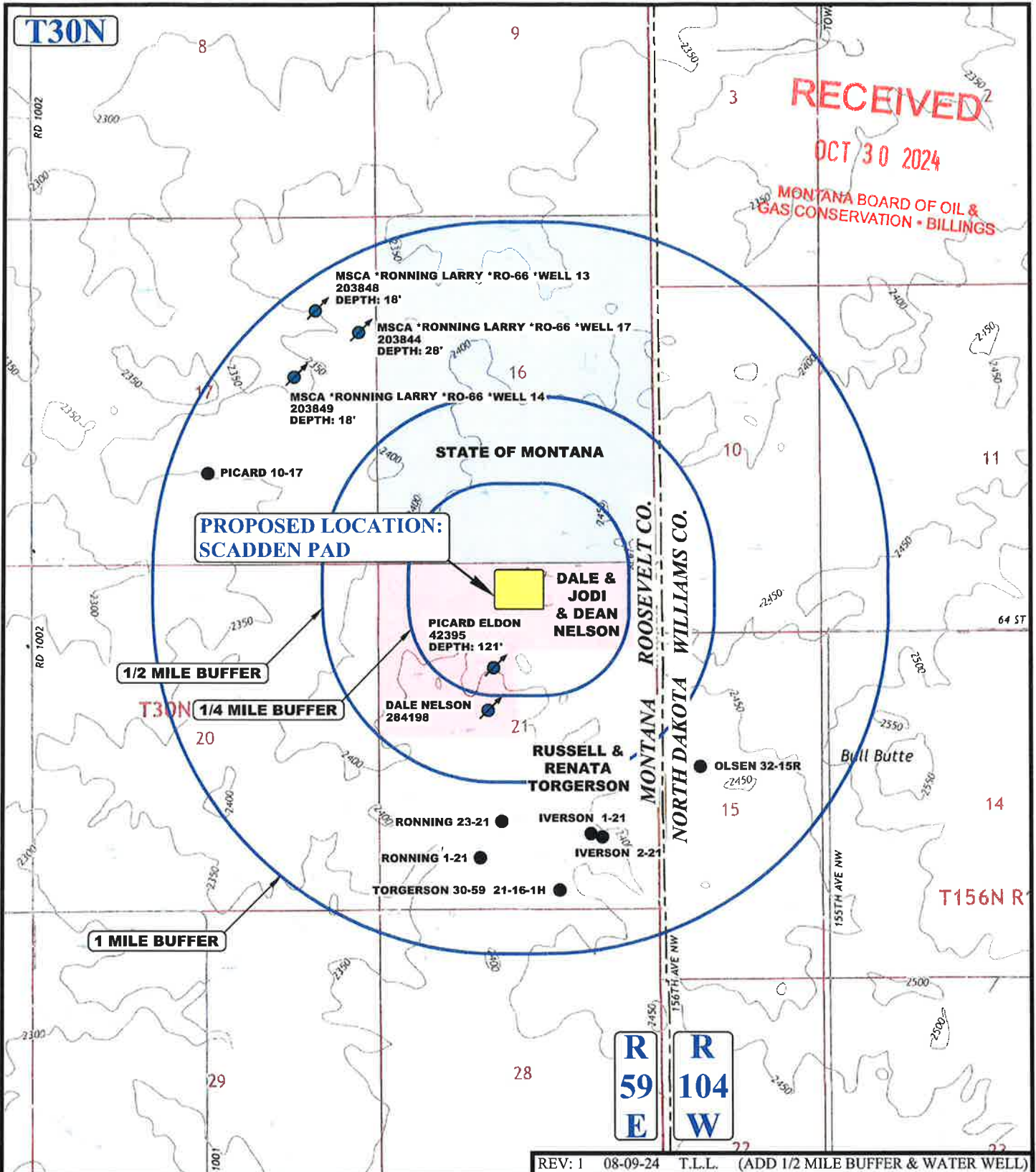
1(j) Names of Owner of Record:

The surface owners and mineral owners are within the AOR are presented in Appendix IX. Phoenix Operating LLC has notified the current operators, surface owners and lease owners in accordance with 36.22.1410, notification requirements for an underground injection permit. Appendix X is an affidavit attesting to the fact that notices have been mailed.

List of Appendices/Attachments:

- I** ¼ -Mile Area of Review Map
- II** Plat of SWD Location
- III** Representative Log
- IV** Sundry Notices
- V** Proposed Drilling & Completion Procedure
- VI** Proposed Wellbore Schematic/Directional Plan
- VII** SWD Layout Diagram
- VIII** Water Analysis – Source Waters
- IX** List of Surface Owners/Mineral Owners in ¼ -Mile AOR
- X** Affidavit of Notification to Landowners
- XI** Example of Landowner Notifications of Application for Injection
- XII** Notice of Intention to Apply for a Class II Well
- XIII** Affidavits of Publication

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REV: 1 08-09-24 T.L.L. (ADD 1/2 MILE BUFFER & WATER WELL)

LEGEND:

- OIL/GAS WELLS
- ⊕ WATER WELLS



UELS, LLC
 Corporate Office * 85 South 200 East
 Vernal, UT 84078 * (435) 789-1017



PHOENIX OPERATING LLC

SCADDEN PAD
 NE 1/4 NW 1/4, SECTION 21, T30N, R59E, P.M.M.
 ROOSEVELT COUNTY, MONTANA

SURVEYED BY	C.B., N.G.	05-10-24	SCALE
DRAWN BY	T.L.L.	06-12-24	1 : 24,000
WELL PROXIMITY MAP			TOPO C

LEGEND:

- = PROPOSED WELLHEAD.
- ▲ = SECTION CORNERS LOCATED.
- △ = SECTION CORNERS RE-ESTABLISHED. (Not Set on Ground.)

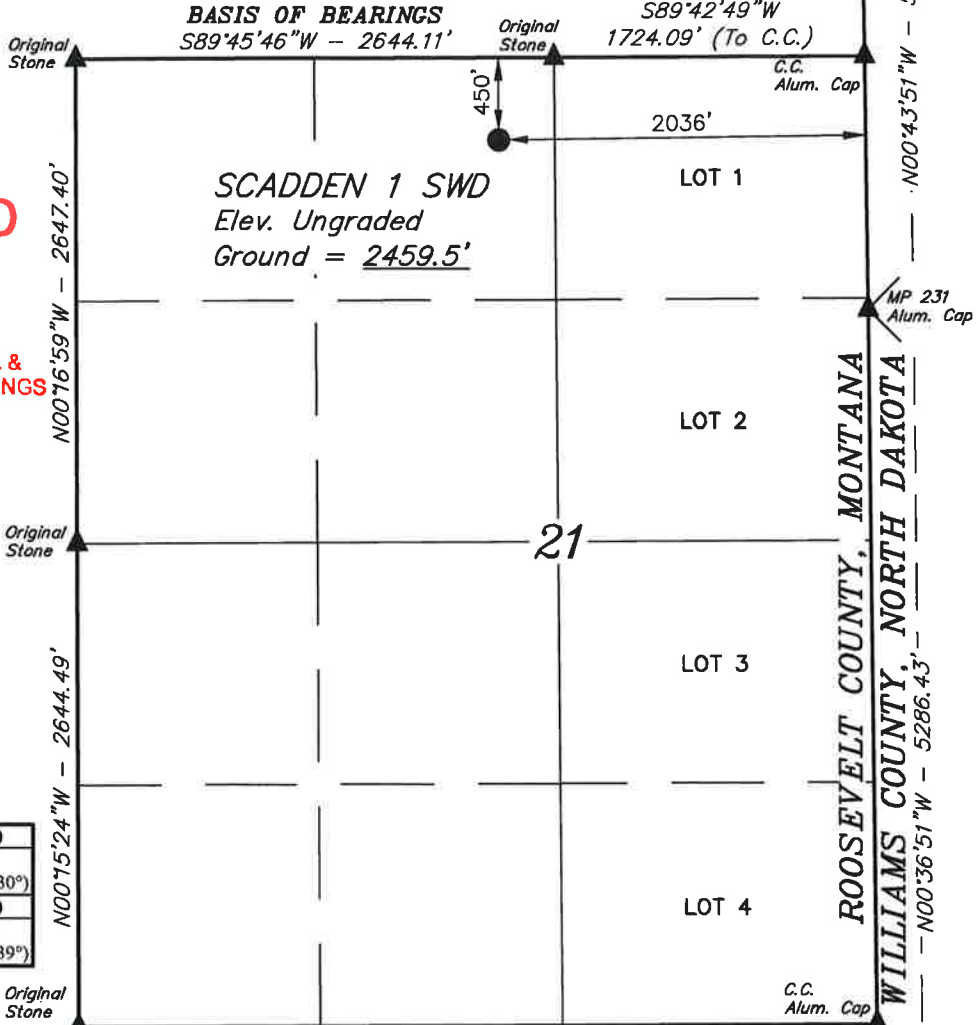
NOTE:
Distances referenced on plat to section lines are perpendicular.

T30N, R59E, P.M.M.

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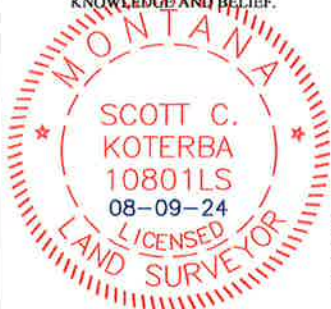


NAD 83 (SURFACE HOLE LOCATION)	
LATITUDE = 48°20'40.69" (48.344637°)	
LONGITUDE = -104°03'17.03" (-104.054730°)	
NAD 27 (SURFACE HOLE LOCATION)	
LATITUDE = 48°20'40.61" (48.344613°)	
LONGITUDE = -104°03'15.26" (-104.054239°)	

CERTIFICATE

THIS IS TO CERTIFY THAT THE ABOVE PLAT WAS PREPARED FROM FIELD NOTES OF ACTUAL SURVEYS MADE BY ME OR UNDER MY SUPERVISION AND THAT THE SAME ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

S89°44'49"W - 4400.76' (To C.C.)
S89°44'49"W - 4400.33' (To True)



Scott C. Koterba

SCOTT C. KOTERBA
REGISTERED LAND SURVEYOR
REGISTRATION NO. 10801LS
STATE OF MONTANA



R R
59 104
E W

REV: 1 08-09-24 T.L.L. (UPDATE WELL NAME)

BASIS OF BEARINGS
BASIS OF BEARINGS IS A G.P.S. OBSERVATION



PHOENIX OPERATING LLC

SCADDEN 1 SWD
NE 1/4 NW 1/4, SECTION 21, T30N, R59E, P.M.M.
ROOSEVELT COUNTY, MONTANA



UELS, LLC
Corporate Office
85 South 200 East
Vernal, UT 84078
(435) 789-1017

SURVEYED BY	C.B., N.G.	05-10-24	SCALE
DRAWN BY	A.T.	05-29-24	1" = 1000'

WELL LOCATION PLAT

III. Scadden 1 SWD Representative Log

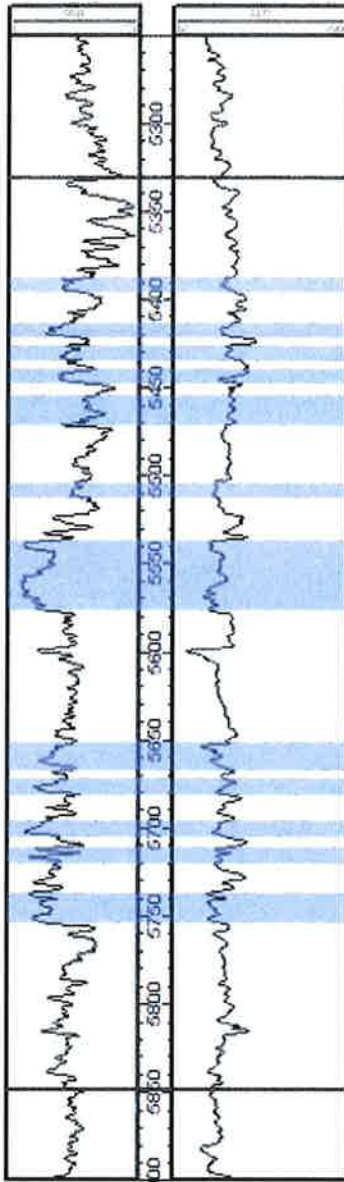
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24-21
ROHNING
TIPPERARY O&G CORP
25085215100000
T33N R59E S21

INKR



SWIFT

III. Scadden 1 SWD - Representative Log

DST NO. 2
600 cc Oil
1500 cc WTR
6.43 ccfg
950 psi

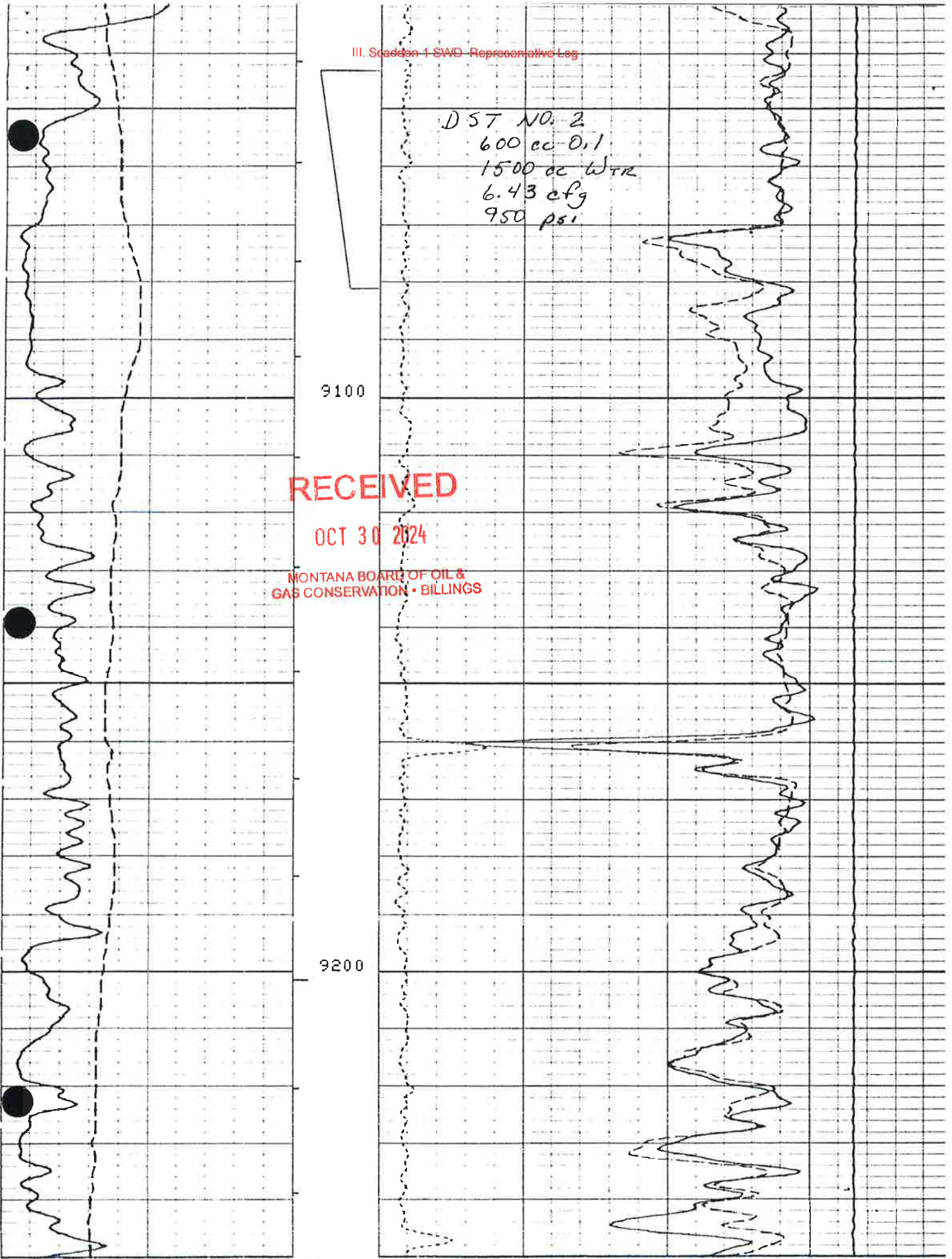
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III. Scadon 1 5VOT Representative Log

DST NO. 2

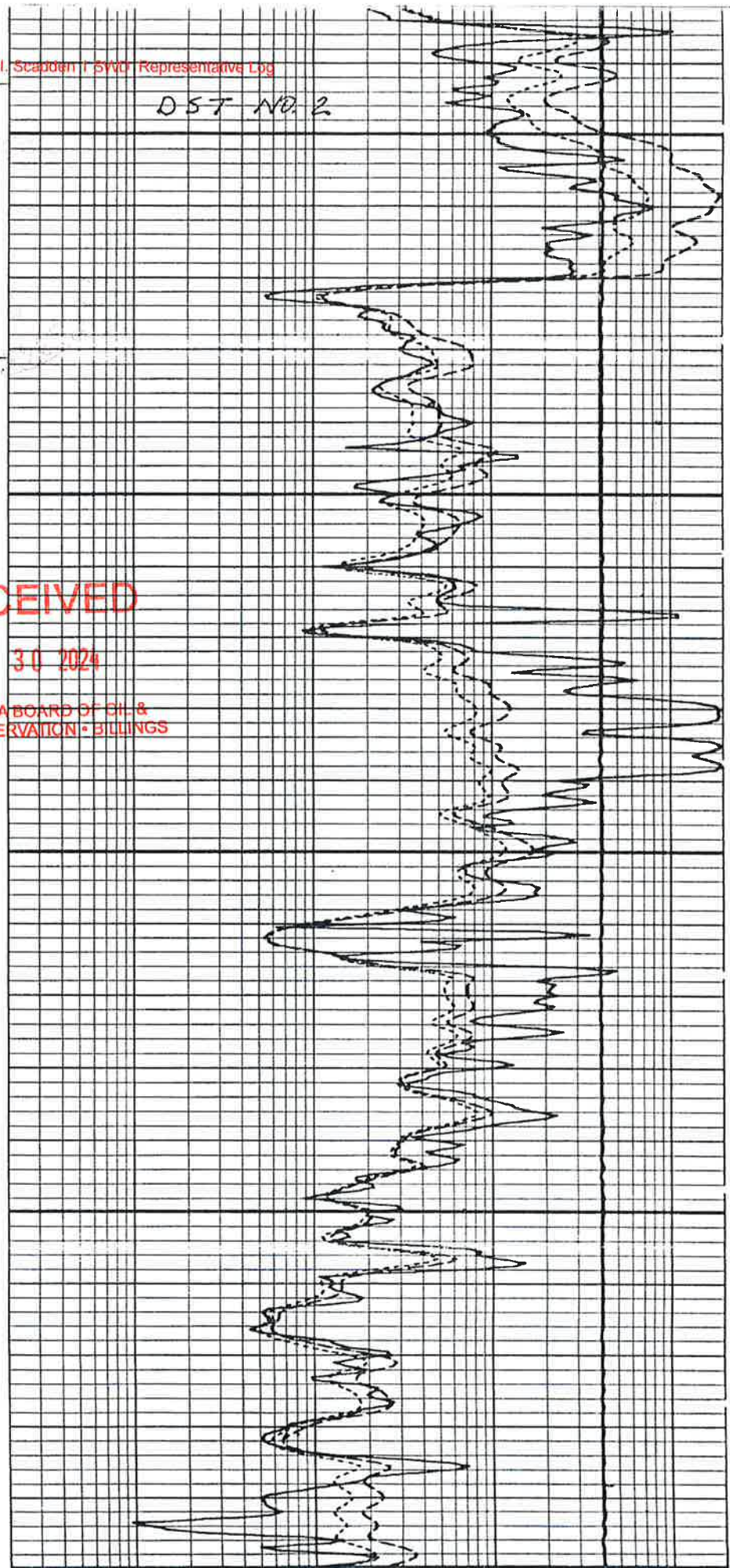
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III. Scadden 1 SWD Representative Log

DST NO. 2

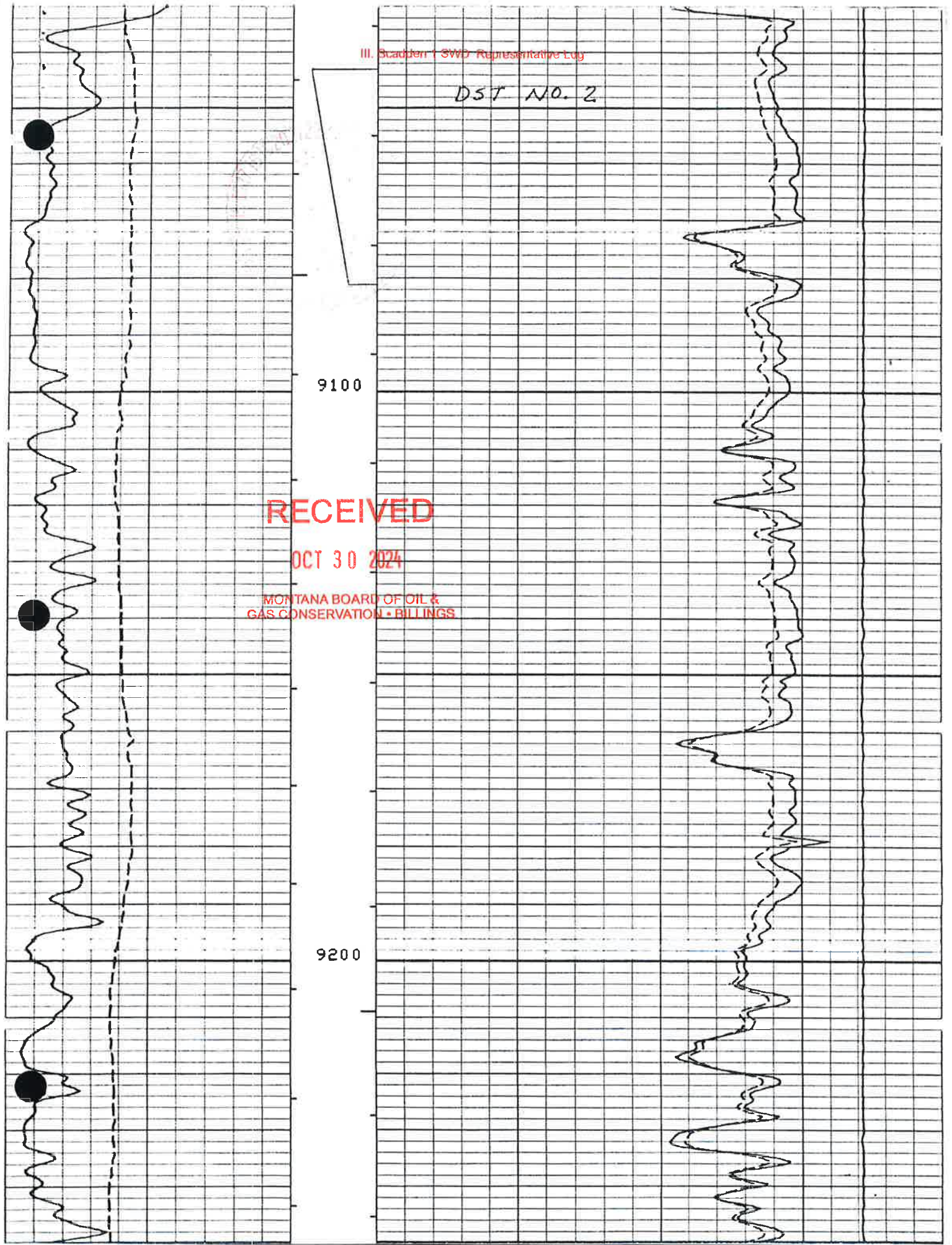
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FORM NO. 2-R 10/09

ARM 36.22.307, 601, 605,
1003, 1004, 1011, 1013,
1103, 1222, 1240, 1301,
1306, 1309, and 1417

OCT 30 2024

MONTANA BOARD OF OIL &
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Submit In Quadruplicate To:
MONTANA BOARD OF OIL AND GAS CONSERVATION
2535 ST. JOHNS AVENUE
BILLINGS, MONTANA 59102

SUNDRY NOTICES AND REPORT OF WELLS

Operator PHOENIX OPERATING LLC		Lease Name: SCADDEN
Address 4643 S ULSTER STREET, SUITE 1510		Type (Private/State/Federal/Tribal/Allotted): PRIVATE
City DENVER	State CO	Zip Code 80237
Telephone 855-868-4244	Fax	
Location of well (1/4-1/4 section and footage measurements): 450' FNL 2038' FEL NENW SECTION 24, T30N, R59E		Well Number: 1 SWD
API Number: 25		Unit Agreement Name:
Well Type (oil, gas, injection, other): INJECTION		Field Name or Wildcat: WILDCAT, ROOSEVELT
State	County	Township, Range, and Section: 24, 59N, 30E
		County: ROOSEVELT

Indicate below with an X the nature of this notice, report, or other data:

Notice of Intention to Change Plans	<input type="checkbox"/>	Subsequent Report of Mechanical Integrity Test	<input type="checkbox"/>
Notice of Intention to Run Mechanical Integrity Test	<input type="checkbox"/>	Subsequent Report of Stimulation or Treatment	<input type="checkbox"/>
Notice of Intention to Stimulate or to Chemically Treat	<input type="checkbox"/>	Subsequent Report of Perforation or Cementing	<input type="checkbox"/>
Notice of Intention to Perforate or to Cement	<input type="checkbox"/>	Subsequent Report of Well Abandonment	<input type="checkbox"/>
Notice of Intention to Abandon Well	<input type="checkbox"/>	Subsequent Report of Pulled or Altered Casing	<input type="checkbox"/>
Notice of Intention to Pull or Alter Casing	<input type="checkbox"/>	Subsequent Report of Drilling Waste Disposal	<input type="checkbox"/>
Notice of Intention to Change Well Status	<input type="checkbox"/>	Subsequent Report of Production Waste Disposal	<input type="checkbox"/>
Supplemental Well History	<input type="checkbox"/>	Subsequent Report of Change in Well Status	<input type="checkbox"/>
Other (specify) INTENT TO DRILL & COMPLETE	<input checked="" type="checkbox"/>	Subsequent Report of Gas Analysis (ARM 36.22.1222)	<input type="checkbox"/>
CLASS II INJECTION WELL	<input type="checkbox"/>		<input type="checkbox"/>

Describe Proposed or Completed Operations:
Describe planned or completed work in detail. Attach maps, well-bore configuration diagrams, analyses, or other information as necessary. Indicate the intended starting date for proposed operations or the completion date for completed operations.

PHOENIX OPERATING LLC RESPECTFULLY REQUEST APPROVAL TO DRILL & COMPLETE A DISPOSAL WELL AT THE REFERENCED LOCATION FOR INJECTION OF CLASS II E&P WASTES. NOTICES HAS BEEN PROVIDED TO PARTIES WITHIN 1/4 MILE AREA OF REVIEW OF THE PROPOSED LOCATION. AN APPLICATION FOR HEARING ON THE MONTANA BOARD OF OIL & GAS CONSERVATION DOCKET. HAS BEEN REQUESTED FOR DECEMBER 5, 2024.

PHOENIX OPERATING LLC REQUESTS A VARIANCE TO NOT RUN OPEN HOLE LOGS ON THE SUBJECT WELL.

BOARD USE ONLY

Approved _____
Date _____

Name Title

The undersigned hereby certifies that the information contained on this application is true and correct:

10-28-2024 _____
Date Signed (Agent)

AMY DOEBELE, AUTHORIZED AGENT
Print Name and Title

Telephone: 435-789-1017

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**Phoenix Operating LLC
Drilling Plan**

Scadden 1 SWD

**NENW Sec 21, T30N-R59E
450' FNL 2036' FEL
Roosevelt County, MT**

1. Estimated Formation Tops

Formation	MD	TVD	Comments
Pierre Shale	2165'	2165'	9-5/8" surface casing set at 2,300 & cemented to surface.
Greenhorn	4578'	4578'	
Mowry	4896'	4896'	
Inyan Kara	5332'	5332'	
Swift	5841'	5841'	
Planned TD	5811'	5811'	

Formation elevations are based on a finished pad elevation of 2,444' and a KB elevation of 2,459' (15' rig substructure height).

2. BOP and Pressure Containment Data

Depth Intervals	BOP Equipment
0' to 2,300'	13-1/2" surface hole. No pressure control equipment utilized.
2,300' to TD	11", 3,000 psi Hydraulic Double Ram Type BOP's 11", 3,000 psi Annular BOP
Drilling spool to accommodate choke and kill lines.	
Ancillary equipment and choke manifold to be rated to 3,000 psi. All BOP tests will be performed in accordance with the requirements of onshore order No 2.	
BOP handwheels may be under and or within the substructure of the rig if the drilling used is set up to operate most efficiently in this manner.	

Auxiliary equipment:

- a) Upper and lower Kelly cock will be installed while drilling.
- b) Inside BOP or stab-in valve will be available on rig floor.
- c) Safety valve(s) and subs to fit all string connections will be on floor during drilling operations.
- d) Mud monitoring will be visually observed.

OCT 30 2024

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3. Casing & Cement Programs

a) The proposed casing program is as follows:

	Hole Size	Casing Depth		Casing Details					Cmt
		From	To	OD	Weight	Grade	Cplg	Condition	Cmt Top
Conductor	24"	0'	80'	20"	106.5#	J-55		New	Surface
Surface	13-1/2"	0'	2300'	9-5/8"	36#	J-55	LTC	New	Surface
Intermediate	8-3/4"	0'	5332'	7"	23#	L-80	LTC	New	2,300'
Production	6"	5282'	5811'	4.5"	11.6#	L-80	BTC	New	Un-Cemented

b) Cementing Program:

9-5/8" Surface Casing	Cement Details
TOC at Surface – 55% excess.	Lead: 613 sx (226 bbls) of 12.5 lb/gall, 2.08 ft ³ /sx BJ CEM S100 Type III with 0.13 lb/sx Celloflake, 2.0 lbs/sx CaCl ₂ , 2.0 lbs/sx Sodium Metasilicate, 5% Gypsum and 0.3% Anti-foaming agent (FP-25).
TOC at 1,800' -55% excess.	Tail: 271 sx (71bbls) of 14.2 lb/gall, 1.99 ft ³ /sx BJ CEM S100 Type III with 0.13 lb/sx IntegraSeal, 2.0 lbs/sx Sodium Metasilicate, 5% Gypsum (BWOB) and 0.3% FP-25 (defoamer, BWOB).

7" Intermediate Casing	Cement Details
TOC at 2,300' (BSC) – 65% excess.	Lead: 295 sx (114.5 bbls) of 12.0 lb/gall, 1.46 ft ³ /sx BJ CEM I100 Type III with 0.25 lb/sx IntegraSeal, 5 lb/sx BA-95 (bonding agent) 3% KCL (BWOW), 0.1% R-7C (retarder), 0.4%FL-66 (fluid loss), 0.30% R-3 (retarder) and 0.1% IntegraGuard GW-86 (scavenger). Additives by BWOB.
TOC at 4,150' – 40% excess.	Tail: 167 sx (42.8 bbls) of 14.0 lb/fall, 1.44 ft ³ /sx BJ CEM I100, 20% Fly Ash, 80% Class G, 0.13 lb/sx IntegraSeal Cellophane, 1.0 lb/sx IntegraSeal Pheno, 0.1% IntegraGuard GW-86 (scavenger), and 0.4% FI-66 (fluid loss). Additives by BWOB

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4. Drilling Fluids Program

From:		To:	
Spud (0')		2,300' 13 1/2" Surface Hole, Fresh Water, Gel & Lime Sweeps	
MW, ppg:	8.5 to 9.0	PV, cp:	0 to 25
YP, lb/100 ft ²	0 to 8	pH:	7.0 to 8.5
Funnel Vis, sec:	28 to 50	LGS:	LT 6%

Note: If shallow surface sand or gravel is encountered, rig will mud-up with gel (increase viscosity).

From:		To:	
2,300'		5,332' 8-3/4" Production section – Oil Based Mud	
MW, ppg:	9.2 to 10.0	Elec Stability, v:	400 to 600
YP, lb/100 ft ² :	4 to 12	PV, cp:	12 to 25
Funnel Vis, sec:	40 to 50	HTHP WL, cc:	10 to 20
Oil Water Ratio:	70/30 to 80/20	Chlorides, ppm:	30,000 to 50,000
LGS:	LT 6%	NaCl, mg/l:	250,000 to 300,000

Cuttings Plan: Closed loop system will be utilized during surface and production drilling operations. All drill cuttings will be disposed of at 13 Mile Landfill, Williston, ND.

5. Evaluation Program

Cores:	No Coring is planned.
Testing:	No DST's are planned.
Samples:	No cuttings are planned to be collected on this well.
Surveys:	MWD will be utilized from surface to TD. Surveys will be taken on a 30' survey interval after entering the Mowry.

The logging program will be as follows:

Depth Interval	Depth Interval
Base of surface casing to TD	Triple Combo + MWD-GR
7", Production casing (TD to surface)	CBL-VDL-GR-CCL

Directional Planning / Anit-Collision:

The Scadden 1 SWD well is planned as a vertical well with a 50 ft target radius from the wellhead. anti-collision avoidance modeling will be completed before spud. Anti-Collision reports will be based on known offset wells to Phoenix Operating LLC within the vicinity of the planned wellbore path.

6. Drilling/Completion Program:

1. Move in drilling rig (Notify State Inspector prior to spud).
2. Pick up BHA and drill the Surface interval as follows:
 - a. 13-1/2" Bit and MWD/Directional Tools.
 - b. Fresh water will be utilized.
 - c. Drill approx. 150' into the Pierre Shale formation.
3. At TD circulate to condition hole.
4. TOOH and lay down BHA
5. Run 9-5/8" J55-36# LTC casing.

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- a. Centralizers on bottom 3 joints minimum.
- b. Float shoe and float collar to be utilized.
6. Pump surface casing cement job per cementing program.
 - a. Spacer, Lead Slurry, Tail Slurry, Displace with fresh water.
7. Pressure test surface casing (Required pressure & time).
8. Install Wellhead and BOP.
 - a. Nipple up 3M BOP stack and test per BLM Onshore Order No. 2.
 - b. Install wear-bushing.
9. Pick up BHA and drill the Production interval as follows:
 - a. 8 3/4" bit and MWD/Directional tools.
 - b. *MWD gamma every 30' after entering the Mowry.*
 - c. Oil-based drilling fluid will be utilized.
 - d. Drill to the top of the Inyan Kara formation ~5332' TVD.
10. At TD circulate to condition hole and make a wiper trip to the surface shoe.
11. TOO H and lay down BHA.
12. Run 7" L80 – 23# LTC casing.
 - a. Casing will be centralized.
 - b. Float shoe and Float collar to be utilized.
13. Pump Intermediate cement per cementing program.
 - a. Spacer, Lead Slurry, Tail Slurry, Displace with salt water.
14. Wait on cement prior to drilling out 7" shoe and drilling 6" open hole section.
15. Run CBL on 7" casing, from PBT D to surface. CBL must be reviewed prior to drilling out the shoe.
 - a. If unable to get to the bottom with CBL tools a clean out will be required.
 - b. *CBL on the Intermediate casing must be completed prior to starting drilling of the open hole and submitted to the State for review prior to running the 4 1/2" liner.*
16. Pressure test production casing to 1500 psi.
17. Once CBL has been reviewed, pick up BHA and drill the Open-Hole interval as follows:
 - a. 6" bit and MWD/Directional tools.
 - b. *MWD gamma every 30' after entering the Mowry formation.*
 - c. *A geologist must be onsite to catch samples every 30' once in the Inyan Kara formation.*
 - d. Brine drilling fluid will be utilized.
 - e. Drill to a maximum of ~5,811' TVD. Approximately 30' above the top of the Swift formation.
 - f. *If it is suspected that the Swift is encountered while drilling, there will be an all stop for evaluation.*
18. At TD circulate to condition hole.
19. TOO H and lay down BHA.
20. Run 4 1/2" P-110-11.6# BTC pre-perforated liner.

DESCRIPTION	OD	ID
5" ID x 8' Polished Bore Receptacle (PBR)	5.750"	5.000"
4 1/2" x 7" OptiPak Liner Hanger Packer BTC pin	5.875"	3.920"
1 Jts 4 1/2" 11 6# IPC Blank BTC Liner	5.000"	4.000"
1 Jts 4 1/2" 11 6# Blank BTC Liner	5.000"	4.000"
~ 7 - 8 Jts 4 1/2" 11 6# Pre-Perf BTC Liner	5.000"	4.000"
Guide Shoe Joint w/ Aluminum Nose and Side Ports	5.000"	750"

- a. 4 1/2" nickel plated, Liner Hanger and packer will be set within 100' of the open hole in 7" casing with good cement bond.
- b. Run 4 1/2" Blank to below 7" shoe.
21. TOO H and lay down drill pipe and liner tools.
22. Secure well and release drilling rig.
23. Install 7 1/16" – 5M tubing head and master valve.
24. MIRU service rig. Install and test BOPs.

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25. Recover Dakota water sample from formation.
 - a. Check pressure and attempt to establish flow from the Dakota.
 - b. If flow is established, flow fluid to surface and recover a fluid sample.
 - c. If unable to recover fluid, RIH with 2 7/8" tubing and packer. Set packer above the liner top and attempt to swab the well to recover formation fluids to surface.
 - d. If unable to recover fluid samples at surface, RIH with wireline and recover a downhole sample.
 - e. Take samples to lab for full water analysis.
26. Run 3 1/2" L80-9.3# BTC Internally Plastic-Coated tubing.
 - a. Seal assembly ran and stung into PBR at liner top.
 - b. Land tubing hanger in wellhead with tubing in 45k compression.
27. Perform MIT on tubing annulus, seal assembly and packer.
 - a. *Notify State inspector prior to performing MIT. Inspector must witness MIT.*
 - b. *MIT to 1000 psi for 15 minutes, or as directed by the State inspector.*
28. RDMO rig and service equipment.
29. Install 4 1/16" – 5M master valve.
30. Install flowlines from facility to wellhead.
 - a. *Flowlines must be pressure tested to 100 psi above the permitted MASP from the Injection Pump to the Wellhead prior to injection.*
 - b. *Pressure test results must be reported to the NDIC via sundry.*
31. Begin injection test.
32. Acidize well as needed to improve injection.
 - a. Acidize with 15% HCl and rock-salt or polymer diverter.

7. Abnormal Pressure and H2S Gas

No abnormal pressure, temperatures or other hazards are anticipated. H2S gas is not expected to be encountered in this wellbore. However, precautions will be taken to monitor for H2S while drilling the vertical section.

8. Hydraulic Fracturing Stimulation – N/A

No hydraulic fracturing will be attempted on this wellbore.

9. Contact Information:

Phoenix Operating LLC
4643 South Ulster Street, Suite 1510
Denver, CO 80237
Attn: Mark Johnson
Email mjohnson@phxoperating.com
303.548.1953

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PHOENIX OPERATING COMPANY

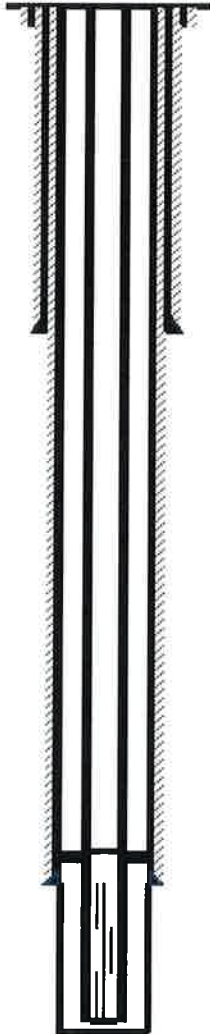
Scadden 1 SWD

Inyan Kara Injection
Roosevelt County, Montana

SHL: 450ft FNL & 2036ft FEL of Sec 21-30N-59E

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Proposed Vertical Wellbore



Wellhead Description

Cameron 7 1/16" - 5M

Casing Description

String	Size	Weight	Grade	Cplg	Top	Bottom	Hole Size	Cement Top
Conductor	20"	106.5	J-55		0'	80'	24	Surface
Surface	9 5/8"	36#	J-55	LTC	0'	2100'	13 1/2"	Surface
Intermediate	7"	23#	L-80	LTC	0'	5332'	8 3/4"	2100'
Liner	4 1/2"	11.6#	L-80	BTC	5282'	5811'	6"	Un-Cemented

*7" Casing set and cemented at the top of the Dakota formation

*Shoe-Track consists of one 7" Single-Valve Float Shoe, one joint of 7" casing, and one 7" Single-Valve Float Collar. Shoe-Track will be cemented from the Float Shoe to the Float Collar (~40').

*4 1/2" liner will be ran with a liner hanger and liner-top packer

*4 1/2" liner-top packer will be set no greater than 100' above the 7" shoe in good cement verified by CBL

Tubing Description (Est'd Depth - Top of Liner)

Size	Weight	Grade	Cplg	Top	Bottom
3 1/2" IPC	9.3#	L-80	EUE	0'	5282'

*Tubing ran with a seal assembly stung into PBR in liner top

*MIT performed to 1000 psi on tubing annulus, packer and seal assembly

6" OH - Perforated Liner

Formation	Top	Bottom	Stimulation
Dakota	5332'	5811'	15% HCl + Rock Salt or Polymer Diverter

TMD 5811'
TVD 5811'

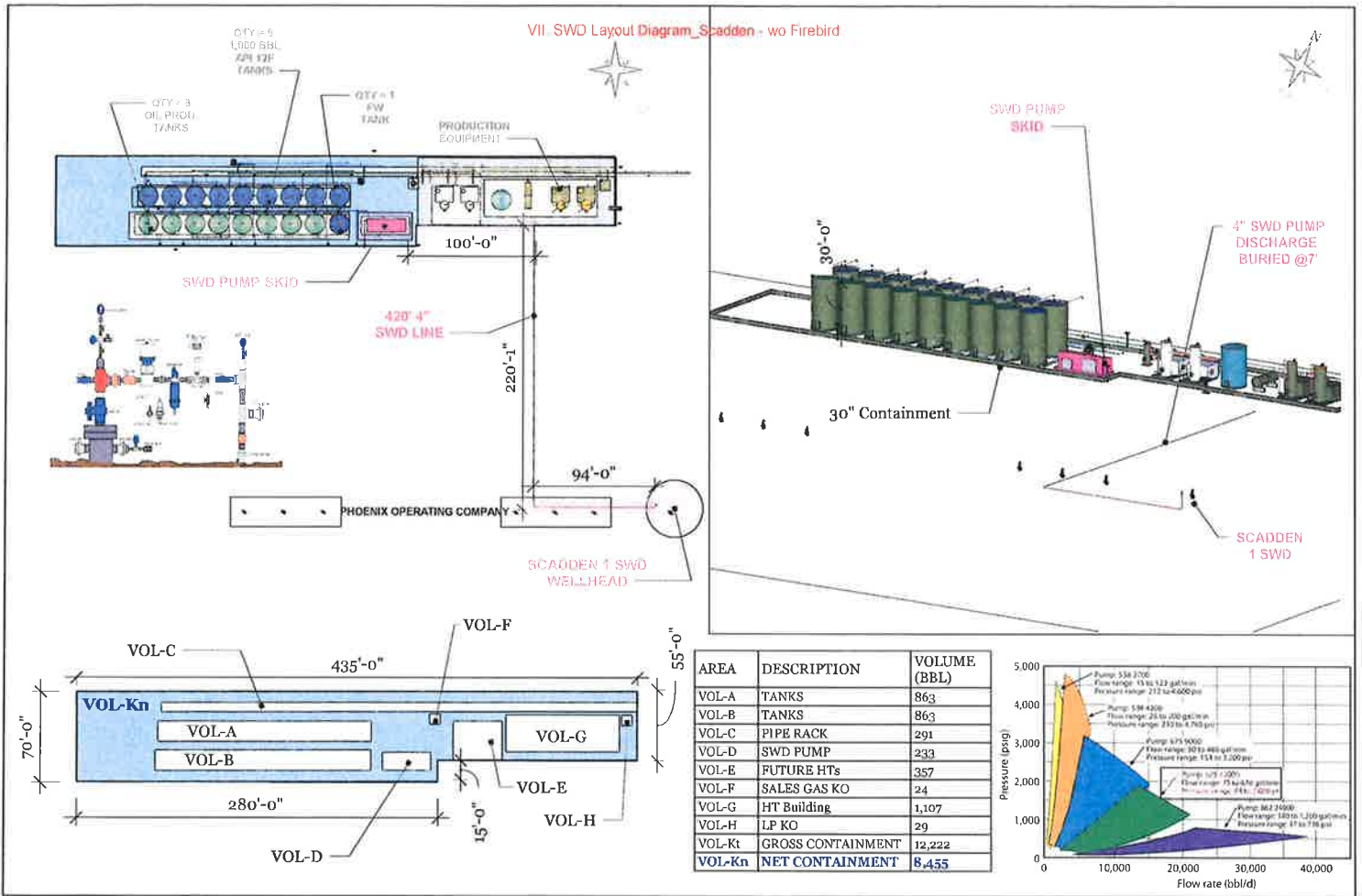
*Above Depths are Measured depths

*TD at least 30' above the top of the Swift formation

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	SWD FACILITY LAYOUT DIAGRAM		REVISIONS		A 01 A										
	PHOENIX OPERATING COMPANY SCADDEN SOUTH PAD	SCADDEN 1 SWD	<table border="1"> <thead> <tr> <th>MM/DD/YY</th> <th>REMARKS</th> </tr> </thead> <tbody> <tr> <td>09/05/24</td> <td>SS - Initial Draft</td> </tr> <tr> <td></td> <td></td> </tr> <tr> <td></td> <td></td> </tr> <tr> <td></td> <td></td> </tr> <tr> <td></td> <td></td> </tr> </tbody> </table>	MM/DD/YY		REMARKS	09/05/24	SS - Initial Draft							
MM/DD/YY	REMARKS														
09/05/24	SS - Initial Draft														



VIII. Water Analysis - Source Waters

MINNESOTA VALLEY TESTING LABORATORIES, INC.

1126 North Front St. ~ New Ulm, MN 56073 ~ 800-782-3557 ~ Fax 507-359-2890
2616 East Broadway Ave. ~ Bismarck, ND 58501 ~ 800-279-6885 ~ Fax 701-258-9724
1201 Lincoln Hwy. ~ Nevada, IA 50201 ~ 800-362-0855 ~ Fax 515-382-3885
www.MVTL.com



Account #: 23037 **Client:** Astro-Chem Laboratory, Inc.
Workorder: Milloy 10-3-24 #2H Well Pad (65921)

Brenda Benth
Astro-Chem
4102 2nd Ave W
Williston, ND 58801

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Certificate of Analysis

Approval

All data reported has been reviewed and approved by:

Stacy Zander, Bismarck Assistant Lab Manager Bismarck, ND

Analyses performed under Minnesota Department of Health Accreditation conforms to the current TNI standards.

NEW ULM LAB CERTIFICATIONS:
MN LAB # 027-015-125 ND WW/DW # R-040

BISMARCK LAB CERTIFICATIONS:
MN LAB # 038-999-267 ND W/DW # ND-016 SD SDWA

MVTL guarantees the accuracy of the analysis done on the sample submitted for testing. It is not possible for MVTL to guarantee that a test result obtained on a particular sample will be the same on any other sample unless all conditions affecting the sample are the same, including sampling by MVTL. As a mutual protection to clients, the public and ourselves, all reports are submitted as the confidential property of clients, and authorization for publication of statements, conclusions or extracts from or regarding our reports is reserved pending our written approval.

Report Date: Wednesday, October 2, 2024 4:29:04 PM



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1201 Lincoln Hwy. ~ Nevada, IA 50201 ~ 800-362-0855 ~ Fax 515-382-3885
www.MVTL.com



Account #: 23037

Client: Astro-Chem Laboratory, Inc.

Analytical Results

Table with 7 columns: Lab ID, Sample ID, Date Collected, Date Received, Matrix, Collector, Temp @ Receipt (C), Received on Ice. Includes parameters like Density and Specific Gravity.

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October 10, 2024

Christina Jungels
Astro-Chem Lab, Inc.
4102 2nd Ave. W.
Williston, ND 58801

RE: Project: Phoenix Operating, LLC
Pace Project No.: 10709475

Dear Christina Jungels:

Enclosed are the analytical results for sample(s) received by the laboratory on September 26, 2024. The results relate only to the samples included in this report. Results reported herein conform to the applicable TNI/NELAC Standards and the laboratory's Quality Manual, where applicable, unless otherwise noted in the body of the report.

The test results provided in this final report were generated by each of the following laboratories within the Pace Network:

- Pace Analytical Services - Minneapolis
- Pace Analytical Services - Ormond Beach

If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Andrea Richardson

Andrea Richardson
andrea.richardson@pacelabs.com
(218)341-6080
Project Manager

Enclosures

cc: Accounts Payable, Astro-Chem Lab, Inc.



REPORT OF LABORATORY ANALYSIS

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CERTIFICATIONS

MONTANA BOARD OF OIL &
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Project: Phoenix Operating, LLC
Pace Project No.: 10709475

Pace Analytical Services, LLC - Minneapolis MN

1700 Elm Street SE, Minneapolis, MN 55414
Alabama Certification #: 40770
Alaska Contaminated Sites Certification #: 17-009
Alaska DW Certification #: MN00064
Arizona Certification #: AZ0014
Arkansas DW Certification #: MN00064
Arkansas WW Certification #: 88-0680
California Certification #: 2929
Colorado Certification #: MN00064
Connecticut Certification #: PH-0256
DoD Certification via A2LA #: 2926.01
EPA Region 8 Tribal Water Systems+Wyoming DW Certification #: via MN 027-053-137
Florida Certification #: E87605
Georgia Certification #: 959
GMP+ Certification #: GMP050884
Hawaii Certification #: MN00064
Idaho Certification #: MN00064
Illinois Certification #: 200011
Indiana Certification #: C-MN-01
Iowa Certification #: 368
ISO/IEC 17025 Certification via A2LA #: 2926.01
Kansas Certification #: E-10167
Kentucky DW Certification #: 90062
Kentucky WW Certification #: 90062
Louisiana DEQ Certification #: AI-03086
Louisiana DW Certification #: MN00064
Maine Certification #: MN00064
Maryland Certification #: 322
Michigan Certification #: 9909
Minnesota Certification #: 027-053-137
Minnesota Dept of Ag Approval: via MN 027-053-137
Minnesota Petrofund Registration #: 1240

Mississippi Certification #: MN00064
Missouri Certification #: 10100
Montana Certification #: CERT0092
Nebraska Certification #: NE-OS-18-06
Nevada Certification #: MN00064
New Hampshire Certification #: 2081
New Jersey Certification #: MN002
New York Certification #: 11647
North Carolina DW Certification #: 27700
North Carolina WW Certification #: 530
North Dakota Certification (A2LA) #: R-036
North Dakota Certification (MN) #: R-036
Ohio DW Certification #: 41244
Ohio VAP Certification (1700) #: CL101
Oklahoma Certification #: 9507
Oregon Primary Certification #: MN300001
Oregon Secondary Certification #: MN200001
Pennsylvania Certification #: 68-00563
Puerto Rico Certification #: MN00064
South Carolina Certification #:74003001
Tennessee Certification #: TN02818
Texas Certification #: T104704192
Utah Certification #: MN00064
Vermont Certification #: VT-027053137
Virginia Certification #: 460163
Washington Certification #: C486
West Virginia DEP Certification #: 382
West Virginia DW Certification #: 9952 C
Wisconsin Certification #: 999407970
Wyoming UST Certification via A2LA #: 2926.01
USDA Permit #: P330-19-00208

Pace Analytical Services Ormond Beach

8 East Tower Circle, Ormond Beach, FL 32174
Alaska DEC- CS/UST/LUST
Alabama Certification #: 41320
California Certification# 3096
Colorado Certification: FL NELAC Reciprocity
Connecticut Certification #: PH-0216
Delaware Certification: FL NELAC Reciprocity
DoD-ANAB #:ADE-3199
Florida Certification #: E83079
Georgia Certification #: 955
Guam Certification: FL NELAC Reciprocity
Hawaii Certification: FL NELAC Reciprocity
Illinois Certification #: 200068
Indiana Certification: FL NELAC Reciprocity
Kansas Certification #: E-10383
Kentucky Certification #: 90050

Louisiana Certification #: FL NELAC Reciprocity
Louisiana Environmental Certificate #: 05007
Maine Certification #: FL01264
Maryland Certification: #346
Massachusetts Certification #: M-FL1264
Michigan Certification #: 9911
Mississippi Certification: FL NELAC Reciprocity
Missouri Certification #: 236
Montana Certification #: Cert 0074
Nebraska Certification: NE-OS-28-14
Nevada Certification: FL NELAC Reciprocity
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CERTIFICATIONS

Project: Phoenix Operating, LLC
Pace Project No.: 10709475

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Pace Analytical Services Ormond Beach

North Dakota Certification #: R-216
Ohio DEP 87780
Oklahoma Certification #: D9947
Pennsylvania Certification #: 68-00547
Puerto Rico Certification #: FL01264
South Carolina Certification: #96042001
Tennessee Certification #: TN02974
Texas Certification: FL NELAC Reciprocity

US Virgin Islands Certification: FL NELAC Reciprocity
Utah FL NELAC Reciprocity
Utah
Virginia Environmental Certification #: 460165
West Virginia Certification #: 9962C
Wisconsin Certification #: 399079670
Wyoming (EPA Region 8): FL NELAC Reciprocity

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SAMPLE SUMMARY

Project: Phoenix Operating, LLC
Pace Project No.: 10709475

Lab ID	Sample ID	Matrix	Date Collected	Date Received
10709475001	Milloy 10-3-24 #2H Well Pad	Water	09/21/24 10:30	09/26/24 08:50

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VIII. Water Analysis - Source Waters

Pace Analytical Services, LLC

1700 Elm Street

Minneapolis, MN 55414

(612)607-1700

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SAMPLE ANALYTE COUNT

Project: Phoenix Operating, LLC
Pace Project No.: 10709475

MONTANA BOARD OF OIL &
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Lab ID	Sample ID	Method	Analysts	Analytes Reported	Laboratory
10709475001	Milloy 10-3-24 #2H Well Pad	EPA 6010D	DM	9	PASI-M
		SM 2320B	KEO	3	PASI-M
		SM 2540C	JKH	1	PASI-M
		SM 4500-H+B	KEO	1	PASI-M
		EPA 120.1 Resistivity	SWB	1	PASI-O
		SM 2510	KEO	1	PASI-M
		ASTM D5057	JKH	1	PASI-M
		EPA 300.0	JFP	2	PASI-M
		EPA 353.2	JFP	1	PASI-M

PASI-M = Pace Analytical Services - Minneapolis
PASI-O = Pace Analytical Services - Ormond Beach

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ANALYTICAL RESULTS

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Project: Phoenix Operating, LLC
Pace Project No.: 10709475

Sample: Milloy 10-3-24 #2H Well Pad Lab ID: 10709475001 Collected: 09/21/24 10:30 Received: 09/26/24 08:50 Matrix: Water

Table with columns: Parameters, Results, Units, Report Limit, DF, Prepared, Analyzed, CAS No., Qual. Includes sections for 6010D MET ICP, 2320B Alkalinity, 2540C Total Dissolved Solids, 4500H+ pH, Electrometric, Resistivity, SM2510 Specific Conductance, Specific Gravity, 300.0 IC Anions, and 353.2 Nitrate + Nitrite.

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QUALITY CONTROL DATA

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Project: Phoenix Operating, LLC
Pace Project No.: 10709475

QC Batch: 970670 Analysis Method: EPA 6010D
QC Batch Method: EPA 3010A Analysis Description: 6010D Water
Laboratory: Pace Analytical Services - Minneapolis
Associated Lab Samples: 10709475001

METHOD BLANK: 5072402 Matrix: Water
Associated Lab Samples: 10709475001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Barium	ug/L	ND	10.0	10/01/24 11:18	
Calcium	ug/L	ND	500	10/01/24 11:18	
Chromium	ug/L	ND	10.0	10/01/24 11:18	
Iron	ug/L	ND	50.0	10/01/24 11:18	
Magnesium	ug/L	ND	500	10/01/24 11:18	
Potassium	ug/L	ND	2500	10/01/24 11:18	
Sodium	ug/L	ND	1000	10/01/24 11:18	
Strontium	ug/L	ND	5.0	10/01/24 11:18	
Zinc	ug/L	ND	20.0	10/01/24 11:18	

LABORATORY CONTROL SAMPLE: 5072403

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Barium	ug/L	1000	993	99	80-120	
Calcium	ug/L	20000	19600	98	80-120	
Chromium	ug/L	1000	977	98	80-120	
Iron	ug/L	20000	20000	100	80-120	
Magnesium	ug/L	20000	19800	99	80-120	
Potassium	ug/L	20000	19900	100	80-120	
Sodium	ug/L	20000	20300	102	80-120	
Strontium	ug/L	1000	1020	102	80-120	
Zinc	ug/L	1000	1040	104	80-120	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 5072404 5072405

Parameter	Units	MS		MSD		MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual	
		10708927001 Result	Spike Conc.	Spike Conc.	MS Result							MSD Result
Barium	ug/L	18.0	1000	1000	1000	990	98	97	75-125	1	20	
Calcium	ug/L	85.3 mg/L	20000	20000	101000	97900	81	63	75-125	3	20	P6
Chromium	ug/L	ND	1000	1000	964	955	96	95	75-125	1	20	
Iron	ug/L	3480	20000	20000	22900	22600	97	96	75-125	1	20	
Magnesium	ug/L	125 mg/L	20000	20000	141000	136000	80	55	75-125	4	20	P6
Potassium	ug/L	14.1 mg/L	20000	20000	34600	33800	103	99	75-125	2	20	
Sodium	ug/L	56.1 mg/L	20000	20000	73300	70900	86	74	75-125	3	20	M1
Strontium	ug/L	559	1000	1000	1540	1510	98	96	75-125	2	20	
Zinc	ug/L	ND	1000	1000	1000	995	100	99	75-125	1	20	

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MONTANA BOARD OF OIL & GAS CONSERVATION - BILLINGS

QUALITY CONTROL DATA

Project: Phoenix Operating, LLC
 Pace Project No.: 10709475

QC Batch: 971542 Analysis Method: SM 2320B
 QC Batch Method: SM 2320B Analysis Description: 2320B Alkalinity
 Laboratory: Pace Analytical Services - Minneapolis
 Associated Lab Samples: 10709475001

METHOD BLANK: 5076911 Matrix: Water
 Associated Lab Samples: 10709475001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Alkalinity, Total as CaCO3	mg/L	ND	5.0	10/03/24 08:46	
Alkalinity,Bicarbonate (CaCO3)	mg/L	ND	5.0	10/03/24 08:46	
Alkalinity,Carbonate (CaCO3)	mg/L	ND	5.0	10/03/24 08:46	

LABORATORY CONTROL SAMPLE & LCSD: 5076912 5076913

Parameter	Units	Spike Conc.	LCS Result	LCSD Result	LCS % Rec	LCSD % Rec	% Rec Limits	RPD	Max RPD	Qualifiers
Alkalinity, Total as CaCO3	mg/L	40	44.0	42.6	110	106	90-110	3	20	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 5076914 5076915

Parameter	Units	10709079009 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Alkalinity, Total as CaCO3	mg/L	93.6	40	40	134	135	100	103	80-120	1	20	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 5076916 5076917

Parameter	Units	10709141012 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Alkalinity, Total as CaCO3	mg/L	170	40	40	201	202	76	80	80-120	1	20	P6

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VIII. Water Analysis - Source Waters

Pace Analytical Services, LLC
1700 Elm Street
Minneapolis, MN 55414
(612)607-1700

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QUALITY CONTROL DATA

Project: Phoenix Operating, LLC
Pace Project No.: 10709475

QC Batch: 970573 Analysis Method: SM 2540C
QC Batch Method: SM 2540C Analysis Description: 2540C Total Dissolved Solids
Laboratory: Pace Analytical Services - Minneapolis
Associated Lab Samples: 10709475001

METHOD BLANK: 5072111 Matrix: Water
Associated Lab Samples: 10709475001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Total Dissolved Solids	mg/L	ND	25.0	09/27/24 18:37	

LABORATORY CONTROL SAMPLE: 5072112

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Total Dissolved Solids	mg/L	1000	992	99	80-120	

SAMPLE DUPLICATE: 5072113

Parameter	Units	10709141012 Result	Dup Result	RPD	Max RPD	Qualifiers
Total Dissolved Solids	mg/L	206	196	5	10	

SAMPLE DUPLICATE: 5072114

Parameter	Units	10709194003 Result	Dup Result	RPD	Max RPD	Qualifiers
Total Dissolved Solids	mg/L	157	151	4	10	

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QUALITY CONTROL DATA

Project: Phoenix Operating, LLC
Pace Project No.: 10709475

QC Batch: 972286 Analysis Method: SM 4500-H+B
QC Batch Method: SM 4500-H+B Analysis Description: 4500H+B pH
Laboratory: Pace Analytical Services - Minneapolis
Associated Lab Samples: 10709475001

LABORATORY CONTROL SAMPLE: 5081033

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
pH at 25 Degrees C	Std. Units	5	5.0	100	98-102	H6

SAMPLE DUPLICATE: 5081034

Parameter	Units	10709552003 Result	Dup Result	RPD	Max RPD	Qualifiers
pH at 25 Degrees C	Std. Units	4.3	4.2	1	3	H6

SAMPLE DUPLICATE: 5081035

Parameter	Units	10710487004 Result	Dup Result	RPD	Max RPD	Qualifiers
pH at 25 Degrees C	Std. Units	7.2	7.2	0	3	H6

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QUALITY CONTROL DATA

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Project: Phoenix Operating, LLC
Pace Project No.: 10709475

QC Batch: 971086 Analysis Method: SM 2510
QC Batch Method: SM 2510 Analysis Description: SM2510 Specific Conductance
Laboratory: Pace Analytical Services - Minneapolis
Associated Lab Samples: 10709475001

METHOD BLANK: 5074750 Matrix: Water
Associated Lab Samples: 10709475001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Specific Conductance	umhos/cm	ND	5.0	10/01/24 13:16	

LABORATORY CONTROL SAMPLE: 5074751

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Specific Conductance	umhos/cm	1000	933	93	90-110	

SAMPLE DUPLICATE: 5074752

Parameter	Units	10708260023 Result	Dup Result	RPD	Max RPD	Qualifiers
Specific Conductance	umhos/cm	882	817	8	20	

SAMPLE DUPLICATE: 5074753

Parameter	Units	10708260024 Result	Dup Result	RPD	Max RPD	Qualifiers
Specific Conductance	umhos/cm	1170	1170	1	20	

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QUALITY CONTROL DATA

Project: Phoenix Operating, LLC
Pace Project No.: 10709475

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QC Batch: 972576 Analysis Method: ASTM D5057
QC Batch Method: ASTM D5057 Analysis Description: Spec.Gravity/ASTM D5057
Laboratory: Pace Analytical Services - Minneapolis
Associated Lab Samples: 10709475001

SAMPLE DUPLICATE: 5082528

Parameter	Units	10709912001 Result	Dup Result	RPD	Max RPD	Qualifiers
Specific Gravity		1.22	1.22	0	20	N2

SAMPLE DUPLICATE: 5082529

Parameter	Units	10709914001 Result	Dup Result	RPD	Max RPD	Qualifiers
Specific Gravity		1.22	1.22	0	20	N2

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QUALITY CONTROL DATA

Project: Phoenix Operating, LLC
Pace Project No.: 10709475

QC Batch: 971880 Analysis Method: EPA 300.0
QC Batch Method: EPA 300.0 Analysis Description: 300.0 IC Anions
Laboratory: Pace Analytical Services - Minneapolis

Associated Lab Samples: 10709475001

METHOD BLANK: 5078609 Matrix: Water

Associated Lab Samples: 10709475001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Chloride	mg/L	ND	1.2	10/04/24 23:06	
Sulfate	mg/L	ND	1.2	10/04/24 23:06	

LABORATORY CONTROL SAMPLE: 5078610

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Chloride	mg/L	50	50.2	100	90-110	
Sulfate	mg/L	50	50.4	101	90-110	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 5078611 5078612

Parameter	Units	50383317002		5078611		5078612		% Rec	% Rec	% Rec Limits	RPD	Max RPD	Qual
		MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec						
Chloride	mg/L	42600	50	50	79.6	84.4	74	84	80-120	6	20	M1	
Sulfate	mg/L	28200	50	50	68.7	72.9	81	89	80-120	6	20		

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QUALITY CONTROL DATA

Project: Phoenix Operating, LLC
Pace Project No.: 10709475

QC Batch: 971645 Analysis Method: EPA 353.2
QC Batch Method: EPA 353.2 Analysis Description: 353.2 Nitrate + Nitrite, preserved
Laboratory: Pace Analytical Services - Minneapolis
Associated Lab Samples: 10709475001

METHOD BLANK: 5077223 Matrix: Water
Associated Lab Samples: 10709475001

Table with 6 columns: Parameter, Units, Blank Result, Reporting Limit, Analyzed, Qualifiers. Row: Nitrogen, NO2 plus NO3, mg/L, ND, 0.10, 10/06/24 11:11

LABORATORY CONTROL SAMPLE: 5077224

Table with 7 columns: Parameter, Units, Spike Conc., LCS Result, LCS % Rec, % Rec Limits, Qualifiers. Row: Nitrogen, NO2 plus NO3, mg/L, 1, 1.1, 109, 90-110

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 5077225 5077226

Table with 13 columns: Parameter, Units, Result, MS Spike Conc., MSD Spike Conc., MS Result, MSD Result, MS % Rec, MSD % Rec, % Rec Limits, RPD, Max RPD, Qual. Row: Nitrogen, NO2 plus NO3, mg/L, ND, 1, 1, 1.1, 1.1, 108, 106, 90-110, 2, 20

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 5077227 5077228

Table with 13 columns: Parameter, Units, Result, MS Spike Conc., MSD Spike Conc., MS Result, MSD Result, MS % Rec, MSD % Rec, % Rec Limits, RPD, Max RPD, Qual. Row: Nitrogen, NO2 plus NO3, mg/L, ND, 1, 1, 1.1, 1.1, 107, 106, 90-110, 1, 20

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QUALIFIERS

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Project: Phoenix Operating, LLC

Pace Project No.: 10709475

DEFINITIONS

- DF - Dilution Factor, if reported, represents the factor applied to the reported data due to dilution of the sample aliquot.
- ND - Not Detected at or above adjusted reporting limit.
- TNTC - Too Numerous To Count
- J - Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.
- MDL - Adjusted Method Detection Limit.
- PQL - Practical Quantitation Limit.
- RL - Reporting Limit - The lowest concentration value that meets project requirements for quantitative data with known precision and bias for a specific analyte in a specific matrix.
- S - Surrogate
- 1,2-Diphenylhydrazine decomposes to and cannot be separated from Azobenzene using Method 8270. The result for each analyte is a combined concentration.
- Consistent with EPA guidelines, unrounded data are displayed and have been used to calculate % recovery and RPD values.
- LCS(D) - Laboratory Control Sample (Duplicate)
- MS(D) - Matrix Spike (Duplicate)
- DUP - Sample Duplicate
- RPD - Relative Percent Difference
- NC - Not Calculable.
- SG - Silica Gel - Clean-Up
- U - Indicates the compound was analyzed for, but not detected.
- N-Nitrosodiphenylamine decomposes and cannot be separated from Diphenylamine using Method 8270. The result reported for each analyte is a combined concentration.
- Reported results are not rounded until the final step prior to reporting. Therefore, calculated parameters that are typically reported as "Total" may vary slightly from the sum of the reported component parameters.
- Pace Analytical is TNI accredited. Contact your Pace PM for the current list of accredited analytes.
- TNI - The NELAC Institute.

ANALYTE QUALIFIERS

- D3 Sample was diluted due to the presence of high levels of non-target analytes or other matrix interference.
- H6 Analysis initiated outside of the 15 minute EPA required holding time.
- M1 Matrix spike recovery exceeded QC limits. Batch accepted based on laboratory control sample (LCS) recovery.
- MW Due to matrix interference, achieving a constant weight is not possible.
- N2 The lab does not hold NELAC/TNI accreditation for this parameter but other accreditations/certifications may apply. A complete list of accreditations/certifications is available upon request.
- P6 Matrix spike recovery was outside laboratory control limits due to a parent sample concentration notably higher than the spike level.
- PP The mass of dried residue obtained did not meet the test method requirements based on volume used.

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QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: Phoenix Operating, LLC
Pace Project No.: 10709475

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
10709475001	Milloy 10-3-24 #2H Well Pad	EPA 3010A	970670	EPA 6010D	971065
10709475001	Milloy 10-3-24 #2H Well Pad	SM 2320B	971542		
10709475001	Milloy 10-3-24 #2H Well Pad	SM 2540C	970573		
10709475001	Milloy 10-3-24 #2H Well Pad	SM 4500-H+B	972286		
10709475001	Milloy 10-3-24 #2H Well Pad	EPA 120.1 Resistivity	1045614		
10709475001	Milloy 10-3-24 #2H Well Pad	SM 2510	971086		
10709475001	Milloy 10-3-24 #2H Well Pad	ASTM D5057	972576		
10709475001	Milloy 10-3-24 #2H Well Pad	EPA 300.0	971880		
10709475001	Milloy 10-3-24 #2H Well Pad	EPA 353.2	971645		

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ASTRO-CHEM LAB, INC. 4102 2nd Ave. W. P.O. Box 972 Williston, ND 58801 701-572-7356 www.astrochemlab.com		Client: Phoenix Operating, LLC. Project: Milloy 10-3-24 #2H Well Pad Project Manager: Mark Johnson		CHAIN of CUSTODY				Page 1 of 1			
		Telephone No. 		Fax No. 		Method of Shipment FEDEX OVERNIGHT					
		Container Preservative** 1 U U U 2				Special Detection Limit/Reorder					
		ACL "Oilfield Water"		<small>** Preservative Types: (1) nitric acid (2) sulfuric acid (3) hydrochloric acid (4) sodium hydroxide (5) zinc acetate (6) methanol (7) sodium bisulfate (8) sodium thiosulfate (9) hexane (A) ascorbic acid (B) ammonium sulfate (C) ammonium hydroxide (D) TSP (U) unpreserved (O) Other:</small>							
Sample I.D.	Lab Sample No. ↓ (3615)	Matrix			Analysis Requested				Turn Around Time (working days)		
		No. of Containers	Soil	Water	Air	Other	Ca, Mg, Na, Fe, Cr, Ba, K, Sr, Zn	Chloride, Sulfate, pH, Conductivity, Resistivity, Total Dissolved Solids		Specific Gravity, Alkalinity (Carbonate & Bicarbonate)	Nitrate+Nitrite
Milloy 10-3-24 #2H Well Pad (Treater)	4	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	REMARKS:
WO# : 10709475  10709475											
Sample Received Intact: Yes No		Temperature received: Ice No Ice									
Relinquished by: D.S. (Vestibule)		Date: 9/24/24 Time:		Received by (Signature): Brenda Benth Brenda Benth				Lab Work No.			
Relinquished by: Brenda Benth Brenda Benth		Date: 9/25/24 Time: 2:00 pm		Received by: [Signature]							
Relinquished by:		Date: Time:		Received by laboratory:				Date: Time:			

astrochem@midconetwork.com
www.astrochemlab.com

Methods for Analysis (ACL OIL WATER GUIDELINES)

Alkalinity (2320B)

Alkalinity, Bicarbonate (CaCO₃)

Alkalinity, Carbonate (CaCO₃)

Alkalinity, Total as CaCO₃

Nitrate + Nitrite (353.2)

Nitrogen, NO₂ plus NO₃

pH, Electrometric (4500H+B)

8 Metals-Barium, Chromium, Iron, Zinc, Calcium, Magnesium, Sodium, Potassium (6010D MET ICP)

Chloride & Sulfate (300.0 IC Anlons)

Resistivity (D1125-14)

Specific Conductance (SM2510)

Specific Gravity (ASTM D5057)

Strontium (6020B MET ICPMS)

Total Dissolved Solids (2540C)

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**MONTANA BOARD OF OIL &
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ENV-FRM-MIN4-0150 v17 Sample Condition Upon Receipt

WV Water Analysis - Surface Waters

CLIENT NAME: Astro-Chem Lab, Inc PROJECT #: _____

WO#: 10709475

COURIER: Client Commercial FedEx Pace
 Speedee UPS USPS

PM: AR4 Due Date: 10/10/24
 CLIENT: 11 Astro Che

TRACKING NUMBER: 7188 1920 3365 See Exceptions form ENV-FRM-MIN4-0142

Custody Seal on Cooler/Box Present: YES NO Seals Intact: YES NO Biological Tissue Frozen: YES NO N/A
 Packing Material: Bubble Bags Bubble Wrap None Other Temp Blank: YES NO Type of Ice: Blue Dry Wet
 Thermometer: T1 (0461) T2 (0436) T3 (0459) T4 (0402) T5 (0178) T6 (0235)
 T7 (0042) T8 (0775) T9 (0727) 01339252 (1710) Melted None

Did Samples Originate in West Virginia: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	Were All Container Temps taken: <input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
Correction Factor: <u>-0.1</u> Cooler Temp Read w/Temp Blank: <u>0.9</u> °C	Average Corrected Temp (no Temp Blank Only): _____ °C
NOTE: Temp should be above freezing to 6°C.	Cooler Temp Corrected w/Temp Blank: <u>0.8</u> °C
<input type="checkbox"/> See Exceptions Form ENV-FRM-MIN4-0142 <input type="checkbox"/> 1 Container	

USDA Regulated Soil: <input checked="" type="checkbox"/> N/A (Water sample/Other (describe): _____)	Initials & Date of Person Examining Contents: <u>JMW 9/26/24</u>
Did Samples originate from one of the following states (check maps) → AL, AR, AZ, CA, FL, GA, ID, IA, MS, NC, NM, NY, OK, OR, SC, TN, TX, or VA: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	Did samples originate from a foreign source (international, including Hawaii and Puerto Rico): <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
NOTE: If YES to either question, fill out a Regulated Soil Checklist (ENV-FRM-MIN4-0154) and include with SCUR/COC paperwork.	

LOCATION (check one): <input type="checkbox"/> DULUTH <input checked="" type="checkbox"/> MINNEAPOLIS <input type="checkbox"/> VIRGINIA	YES	NO	N/A	COMMENT(S)												
Chain of Custody Present and Filled Out?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1.												
Chain of Custody Relinquished?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2.												
Sampler Name and/or Signature on COC?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	3.												
Samples Arrived within Hold Time?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	4. If Fecal: <input type="checkbox"/> <8 hrs <input type="checkbox"/> >8 hr, <24 hr <input type="checkbox"/> No												
Short Hold Time Analysis (<72 hr)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	5. <input type="checkbox"/> BOD / cBOD <input type="checkbox"/> Fecal coliform <input type="checkbox"/> Hex Chrom <input type="checkbox"/> HPC <input type="checkbox"/> Nitrate <input type="checkbox"/> Nitrite <input type="checkbox"/> Ortho Phos <input type="checkbox"/> Total coliform/E. coli <input type="checkbox"/> Other: _____												
Rush Turn Around Time Requested?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	6.												
Sufficient Sample Volume? <u>OCT 30 2024</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	7.												
Correct Containers Used?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	8.												
— Pace Containers Used?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	9.												
Containers Intact? <u>MONTANA BOARD OF OIL & GAS CONSERVATION • BILLINGS</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	10. Is sediment visible in the dissolved container: <input type="checkbox"/> YES <input type="checkbox"/> NO												
Field Filtered Volume Received for Dissolved Tests?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	11. If NO, write ID/Date/Time of container below: <u>NO label on sample id only match with Lab Sample number</u>												
Is sufficient information available to reconcile the samples to the COC? NOTE: If ID/Date/Time don't match fill out section 11. Matrix: <input type="checkbox"/> Oil <input type="checkbox"/> Soil <input checked="" type="checkbox"/> Water <input type="checkbox"/> Other	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	12. Sample #: <u>001</u> <input checked="" type="checkbox"/> HNO ₃ <input checked="" type="checkbox"/> H ₂ SO ₄ <input type="checkbox"/> NaOH <input type="checkbox"/> Zinc Acetate Positive for Residual Chlorine: <input type="checkbox"/> YES <input type="checkbox"/> NO												
All containers needing acid/base preservation have been checked? All containers needing preservation are found to be in compliance with EPA recommendation? (HNO ₃ , H ₂ SO ₄ , < 2 pH, NaOH > 9 Sulfide, NaOH > 10 Cyanide) Exceptions: VOA, Coliform, TOC/DOC, Oil & Grease, DRO/8015 (water) and Dioxins/PFAS	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<table border="1"> <thead> <tr> <th colspan="4">pH Paper Lot #</th> </tr> <tr> <th>Residual Chlorine</th> <th>0-5 Roll</th> <th>0-6 Strip</th> <th>0-14 Strip</th> </tr> </thead> <tbody> <tr> <td></td> <td><u>205224</u></td> <td></td> <td></td> </tr> </tbody> </table>	pH Paper Lot #				Residual Chlorine	0-5 Roll	0-6 Strip	0-14 Strip		<u>205224</u>		
pH Paper Lot #																
Residual Chlorine	0-5 Roll	0-6 Strip	0-14 Strip													
	<u>205224</u>															
NOTE: If adding preservation to the container, verify with the PM first. Clients may require adding preservative to the field and equipment blanks when this occurs.				<input type="checkbox"/> See Exceptions form ENV-FRM-MIN4-0142												
Headspace in Methyl Mercury Container?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	13.												
Extra labels present on soil VOA or WIDRO containers?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	14.												
Headspace in VOA Vials (greater than 6mm)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> See Exceptions form ENV-FRM-MIN4-0140												
Trip Blanks Present?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	15.												
Trip Blank Custody Seals Present?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Pace Trip Blank Lot # (if purchased): _____												

CLIENT NOTIFICATION / RESOLUTION FIELD DATA REQUIRED: YES NO

Person Contacted: _____ Date & Time: _____

Comments / Resolution: _____

Project Manager Review: Anchea Richardson Date: 9/27/24

NOTE: When there is a discrepancy affecting North Carolina compliance samples, a copy of this form will be sent to the North Carolina DEQ Certification Office (i.e., out of hold, incorrect preservative, out of temp, incorrect containers).

Labeled By: JMW Line: 2

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OCT 30 2024

MONTANA BOARD OF OIL & GAS CONSERVATION • BILLINGS

Pace

Internal Transfer Chain of Custody



Rush Multiplier Samples Pre-Logged into eCOC

State Of Origin: ND
Cert. Needed: Yes No

Workorder: 10709475 Workorder Name: Phoenix Operating, LLC Owner Received Date: 9/26/2024 Results Requested By: 10/10/2024

Report To: Andrea Richardson, Pace Analytical Minnesota, 1700 Elm Street, Minneapolis, MN 55414, Phone (218)341-6080
Subcontract To: Pace Analytical Ormond Beach, 8 East Tower Circle, Ormond Beach, FL 32174, Phone (386)672-5668
Requested Analysis: WO#: 35908965 (Barcode)

Item	Sample ID	Sample Type	Collect Date/Time	Lab ID	Matrix	Preserved Containers							Resistivity
						BP2U171							
1	Milloy 10-3-24 #2H Well Pad	PS	9/21/2024 10:30	10709475001	Water	1						X	LAB USE ONLY
2													
3													
4													
5													

Transfers	Released By	Date/Time	Received By	Date/Time	Comments
1	Made U/Pace	9/21/2024 10:30	PL Pace	10/13/2024 16	
2					
3					

Cooler Temperature on Receipt °C Custody Seal Y or N (N) Received on Ice Y or N (N) Samples Intact Y or N (N)

***In order to maintain client confidentiality, location/name of the sampling site, sampler's name and signature may not be provided on this COC document. This chain of custody is considered complete as is since this information is available in the owner laboratory.

Page 2 of 21

VIII. Water Analysis - Source Waters
Sample Condition Upon Receipt Form

Pace

Project #
Project Manager:
Client:

WO#: 35908965
PM: JMW1
CLIENT: PACMIN
Due Date: 10/11/24

Date and Initials of person:
Examining contents: BP
Verifying pH:
Initials: KAMI

Thermometer Used: T414
Date: 10/01/24
Time: 1143

State of Origin _____
 For WW projects all containers verified to $\leq 6^{\circ}\text{C}$
Cooler #1 Temp. $^{\circ}\text{C}$ 15 (Visual) +0.1 (Correction Factor) 1.6 (Actual)
Cooler #2 Temp. $^{\circ}\text{C}$ _____ (Visual) _____ (Correction Factor) _____ (Actual)
Cooler #3 Temp. $^{\circ}\text{C}$ _____ (Visual) _____ (Correction Factor) _____ (Actual)
Cooler #4 Temp. $^{\circ}\text{C}$ _____ (Visual) _____ (Correction Factor) _____ (Actual)
Cooler #5 Temp. $^{\circ}\text{C}$ _____ (Visual) _____ (Correction Factor) _____ (Actual)
Cooler #6 Temp. $^{\circ}\text{C}$ _____ (Visual) _____ (Correction Factor) _____ (Actual)
Recheck for OOT $^{\circ}\text{C}$ _____ (Visual) _____ (Correction Factor) _____ (Actual)

Samples on ice, cooling process has begun
 Samples on ice, cooling process has begun
 Samples on ice, cooling process has begun
 Samples on ice, cooling process has begun
 Samples on ice, cooling process has begun
 Samples on ice, cooling process has begun
Time: _____ Initials: _____

Courier: Fed Ex UPS USPS Client Commercial Pace Other:
Shipping Method: Standard Overnight First Overnight Priority Overnight Ground International Priority Other:
Billing: Recipient Sender Third Party Credit Card Unknown

Tracking # 6476 5646 1809
Custody Seal Present: Yes No Seal properly placed and intact: Yes No

Packing Material: Bubble Wrap Bubble Bags None Other:
Ice: Wet Blue Dry None Melted

Samples shorted to lab: Yes No (if yes, complete the following)
Shorted Date: _____ Shorted Time: _____
Bottle Quantity / Type: _____

Chain of Custody:	Present: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Filled Out: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A Sampler Name: <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
	Relinquished To Pace: <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A Sampling Date(s): <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A Sampling Time(s): <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Samples Arrived within Hold Time	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Comments
Rush Turnaround Requested on COC	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	Comments
Sufficient Volume	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	Comments
Correct Containers Used	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Comments
Containers Intact	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Comments
Sample Labels Match COC (Sample ID, Date/Time of Collection)	<input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	Comments
All containers needing acid / base preservation have been checked	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	PRESERVATION INFORMATION MONTANA BOARD OF OIL & GAS CONSERVATION - BILLINGS Preservative: _____ Date: _____ Lot / Trace: _____ Time: _____ Amount added (mL): _____ Initials: _____
All containers needing preservation are found to be in compliance with EPA recommendation:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Exceptions Vials Microbiology O&G PFAS		
Headspace in Volatile Vials? (>8mm)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Trip Blank Present	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	

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OCT 30 2024

Comments / Resolutions (use back for additional comments): NO client label on container, matched by IA label

Labeled by: BP
Reviewed by: EPAS
Delivered by: EPAS

Leased Mineral Owners within AOR

Tri-Star Minerals
P.O. Box 3086
Minot, ND 58702

Susan G. Keillor
P.O. Box 18
Lake Ann, MI 49650

Marcus D. Lee
P.O. Box 1936
Williston, ND 58802

Timothy R. Lee
P.O. Box 81450
Billings, MT 59108

The Stony Creek Trust
c/o James V. Lee and Karen J. Lee
PO BOX 242
Port Orchard, WA 98366

Ann M. Dorwart
9728 Pinnacle Knoll Court
Colorado Springs, CO 80920

The Donald L. Laber Family Trust
c/o Jo Marie S. Nelson
P.O. Box 749
Culbertson, MT 59218

Kringen Oil, LLC
8540 East McDowell Road, Unit 59
Mesa, AZ 85207

Western Energy Corporation
P.O. Box 641
Williston, ND 58802

Crown Resources, LLC,
f/k/a Crown Resources LLP
1555 West Yellowstone Way
Chandler, AZ 85248

Enerlex Inc.
18452 East 111th Street
Broken Arrow, OK 74011

J. P. Furlong Co., f/k/a
Furlong Oil & Minerals Co.
P.O. Box 836
Charleston, IL 61920

The Erickson Family Trust UDT
c/o Daniel M. Erickson and Pamela Jo
Oyloe
591 Knobhill Drive
Lake Havasu City, AZ 86403

Boedecker Resources
P.O. Box 1236
Billings, MT 59103

Kaleb M. Dasinger
122 2nd Avenue Southwest
Sidney, MT 59270

The Carol Ann Maskeny Erickson Living
Trust, c/o Carol Ann Erickson
1753 West Regents Park Road
Crofton, MD 21114

Carol Ann Erickson
1753 West Regents Park Road
Crofton, MD 21114

Christopher Dale Keillor
1002 Carefree Court
Carson City, NV 89705

Jamie Paul Keillor
1619 Pontiac Trail
Ann Arbor, MI 48105

Kathleen Keillor O'Keefe
P.O. Box 166
Traverse City, MI 49685

Smokey Oil, LLC
130 Equinox Drive
Castle Rock, CO 80108

Lucy Rostar
1120 Barber Terrace Northwest
Grand Rapids, MI 49504

The Snead 2000 Revocable Trust c/o
Mark Snead and Ginger Snead
6528 East 101st Street, Building D-1
#443
Tulsa, OK 74133

Timothy P. Furlong
P.O. Box 2556
Bismarck, ND 58502

David Anthony Bussier
705 Woodbridge Drive
Dilworth, MN 56529

Sarah Lynn Bussier Uhler
705 Woodbridge Drive
Dilworth, MN 56529

Nancy Marie Bussier Wahl
1058 5th Avenue West
Dickinson, ND 58601

The Picard Family Trust c/o Samuel L.
Picard
1643 41st Street Way
Billings, MT 59106

Picard One, LLC
c/o Samuel L. Picard
1643 41st Street Way
Billings, MT 59106

Armen G. Suny
325 Lions Head Drive
Monument, CO 80132

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OCT 30 2024

IX. List of Surface Owners - Mineral Owners within AOR

Lana Jane Hoffman 35296 Road 124 Visalia, CA 93291	The Campbell Living Trust c/o Earl C. Morton and Nancy Lou Campbell 18831 North Summerbreeze Way Surprise, AZ 85374	Alicia L. Vinecki 9401 Larchwood Lane Interlochen, MI 49643
Kenneth R. Wittl 19635 Garfield Street Redford, MI 48240	Phillip S. Olson 4025 Boulder Ridge Road Bismarck, ND 58503	Sandra S. Kennedy 1023 Kassuba Road Gaylord, MI 49735
JaNahn A. Barnhouse 2416 377th Avenue Northwest Stanchfield, MN 55080	Greg J. Olson 19726 Irving Street Northwest Elk River, MN 55330	Theresa Jaruzel 4157 McCoy Road Gaylord, MI 49735
Tamara J. Olson 36100 Xenon Street Northwest Princeton, MN 55371	Frank Maziarz 19821 Arthur Street, Apartment 238 Harper Woods, MI 48225	Brock Ebert 919 East 7th Street Gillette, WY 82716
Arthur Matusiak 10328 West Twin River Lane Homosassa, FL 34448	Danielle Lynn Muzyl 1088 Studebaker Avenue Ypsilanti, MI 48198	Anna D. Jaruzel 4157 McCoy Road Gaylord, MI 49735
Denice R. Melin 615 North Fern Street Cambridge, MN 55008	Christine Marie Muzyl P.O. Box 2249 Gaylord, MI 49734	Carol A. Tognetti 2324 Castlewood Drive Gaylord, MI 49735
Marleah Muzyl and William J. Muzyl P.O. Box 673 Gaylord, MI 49734	The Denise Mack Trust 1182 North University Drive Plantation, FL 33322	The Russell Torgerson and Renata Torgerson Revocable Trust 2602 Muirfield Court Missoula, MT 59808
The Robert A. Erickson Living Trust c/o Cleo M. Erickson 11336 Birdie Lane Ray, ND 58849	The Grant M and SueAnn Babcock Revocable Living Trust Survivor's Trust c/o Theodore Roosevelt Babcock P.O. Box 32341 Phoenix, AZ 85064	Marie Kirt 213 East Sheldon Gaylord, MI 49735
Donald T. Kirt W6495 Number 2 Road Menominee, MI 49858	Bonny Downing 1839 Lake Glen Drive Fuquay Varina, NC 27526	William Kirt 3169 Parmator Road Gaylord, MI 49735
The Special Needs Trust of Deborah L. Anderson, c/o First Fiduciary Corporation 4120 Lexington Way Eagan, MN 55123	Jackie Ruta 394 Crestview Drive South Maplewood, MN 55119	Tracy A. Schletz 1200 Josephine Road Roseville, MN 55113
Ricky A. Vinecki 9401 Larchwood Lane Interlochen, MI 49643	Haymaker Properties, L.P. P.O. Box 206200 Dallas, TX 75320	Estate of Scott Allen Keillor c/o Jamie Paul Keillor 1619 Pontiac Trail Ann Arbor, MI 48105

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OCT 30 2024

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

IX. List of Surface Owners - Mineral Owners within AOR

Surface Owners with AOR

Department of Natural Resources &
Conservation (DNRC)
Northeast Land Office
PO BOX 1021
Lewistown, MT 59457-1021

Dale & Jodi & Dean Nelson
533 Big Lk Rd
Homestead, MT 59242

Russell & Renata Torgerson
2602 Muirfield Ct
Missoula, MT 59808-9472

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OCT 30 2024

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

<p>BEFORE THE BOARD OF OIL AND GAS CONSERVATION OF THE STATE OF MONTANA</p> <p>IN THE MATTER OF THE APPLICATION FOR PHOENIX OPERATING LLC FOR THE HEARING OF ITS REQUEST FOR A UIC PERMIT FOR THE SCADDEN 1 SWD WELL, 450' FNL 2036' FEL, SECTION 21, T30N, R59E, P.M.M. ROOSEVELT COUNTY, MONTANA, FOR THE PURPOSE OF WATER INJECTION</p>	<p>AFFIDAVIT OF NOTIFICATION</p>
--	----------------------------------

Date: October 28, 2024

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OCT 30 2024

State of Utah
County of Uintah

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

Amy Doebele, being first duly sworn, deposes and says:

That Notice of advising of Phoenix Operating LLC' application for UIC permit in the captioned matter, in the form attached as "Exhibit A", was mailed to each current operator, surface owner and lease owner within the area of review at the addresses shown in the exhibit attached to the Notice, by mailing a true copy thereof this 29 day of Oct., 2024, postage prepaid, First Class USPS Mail. This affidavit is given as evidence of compliance with A.R.M. 36.22.1410.



Amy Doebele
Authorized Agent

Subscribed and sworn before me on this 29 day of Oct., 2024.



Notary Public of the State of Utah
My Commission Expires: May 17, 2026





October 25, 2024

To: Department of Natural Resources Conservation
Northeast Land Office
PO BOX 1021
Lewistown, MT 59457-1021

RE: Proposed Saltwater Disposal Well

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OCT 30 2024

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

Location of proposed Disposal Well & Facility: Scadden 1 SWD

NE 1/4 NW 1/4, Section 21, Township 30N, Range 59W. P.M.M.
Roosevelt County, Montana

This letter is to advise you that Phoenix Operating LLC (Phoenix) plans to drill and complete the subject well into a Class II saltwater disposal well. Water will be injected into the Dakota group for the purpose of disposal operations.

In accordance with the rules and regulations of the Montana Board of Oil & Gas Conservation (MBOG), Phoenix is required to give notice that it has made an application to perform this work to each surface owner within a one-quarter mile radius of the injection site. The MBOGC will conduct a hearing regarding this application. For the hearing date, please contact the MBOGC by phone at (406) 656-0040, or visit their website at <https://dnrc.mt.gov/BOGC/>. Your comments or objections regarding this application may be directed to the MBOGC at that time.

Written comments or objections may be submitted prior to the hearing to the following address:

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

Please direct any and all of your communication regarding this proposed project, including more information about the upcoming hearing, to Mr. John Gizicki with the MBOGC at (406) 656-0040 or to Mark Johnson with Phoenix Operating LLC at (303) 548-1953.

Sincerely,

Amy Doebele
Authorized Agent for Phoenix Operating LLC



October 25, 2024

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OCT 30 2024

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

To: Dale & Jodi & Dean Nelson
533 Big Lk Rd
Homestead, MT 59242

RE: Proposed Saltwater Disposal Well

Location of proposed Disposal Well & Facility: Scadden 1 SWD

NE 1/4 NW 1/4, Section 21, Township 30N, Range 59W. P.M.M.
Roosevelt County, Montana

This letter is to advise you that Phoenix Operating LLC (Phoenix) plans to drill and complete the subject well into a Class II saltwater disposal well. Water will be injected into the Dakota group for the purpose of disposal operations.

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Billings, MT 59102

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Sincerely,

Amy Doebele
Authorized Agent for Phoenix Operating LLC



October 25, 2024

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OCT 30 2024

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

To: Russel & Renata Torgerson
2602 Muirfield Ct
Missoula, MT 59808

RE: Proposed Saltwater Disposal Well

Location of proposed Disposal Well & Facility: Scadden 1 SWD

NE 1/4 NW 1/4, Section 21, Township 30N, Range 59W. P.M.M.
Roosevelt County, Montana

This letter is to advise you that Phoenix Operating LLC (Phoenix) plans to drill and complete the subject well into a Class II saltwater disposal well. Water will be injected into the Dakota group for the purpose of disposal operations.

In accordance with the rules and regulations of the Montana Board of Oil & Gas Conservation (MBOG), Phoenix is required to give notice that it has made an application to perform this work to each surface owner within a one-quarter mile radius of the injection site. The MBOGC will conduct a hearing regarding this application. For the hearing date, please contact the MBOGC by phone at (406) 656-0040, or visit their website at <https://dnrc.mt.gov/BOGC/>. Your comments or objections regarding this application may be directed to the MBOGC at that time.

Written comments or objections may be submitted prior to the hearing to the following address:

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

Please direct any and all of your communication regarding this proposed project, including more information about the upcoming hearing, to Mr. John Gizicki with the MBOGC at (406) 656-0040 or to Mark Johnson with Phoenix Operating LLC at (303) 548-1953.

Sincerely,

Amy Doebele
Authorized Agent for Phoenix Operating LLC



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OCT 30 2024

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

October 25, 2024

To: Mineral lease owner within ¼ mile of the proposed saltwater disposal well.

RE: Proposed Saltwater Disposal Well

Location of proposed Disposal Well & Facility: Scadden 1 SWD

NE 1/4 NW 1/4, Section 21, Township 30N, Range 59W. P.M.M.
Roosevelt County, Montana

This letter is to advise you that Phoenix Operating LLC (Phoenix) plans to drill and complete the subject well into a Class II saltwater disposal well. Water will be injected into the Dakota group for the purpose of disposal operations.

In accordance with the rules and regulations of the Montana Board of Oil & Gas Conservation (MBOG), Phoenix is required to give notice that it has made an application to perform this work to each mineral lease owner within a one-quarter mile radius of the injection site. The MBOGC will conduct a hearing regarding this application. For the hearing date, please contact the MBOGC by phone at (406) 656-0040, or visit their website at <https://dnrc.mt.gov/BOGC/>. Your comments or objections regarding this application may be directed to the MBOGC at that time.

Written comments or objections may be submitted prior to the hearing to the following address:

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

Please direct any and all of your communication regarding this proposed project, including more information about the upcoming hearing, to Mr. John Gizicki with the MBOGC at (406) 656-0040 or to Mark Johnson with Phoenix Operating LLC at (303) 548-1953.

Sincerely,

Amy Doebele
Authorized Agent for Phoenix Operating LLC



October 29, 2024

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

Attn: Mr. John Gizicki
UIC Program Manager

RE: Application for UIC Permit and Authorization to Drill a Class II Injection Well
Location of proposed Disposal Well & Facility: Scadden 1 SWD
NE ¼ NW ¼, Section 21, Township 30N, Range 59W. P.M.M.
Roosevelt County, Montana

Dear Mr. Gizicki,

Phoenix Operating LLC (Phoenix) respectfully requests approval of an Underground Injection Control (UIC) permit for the referenced location and as described in the attached application. Phoenix has provided notice to the appropriate parties within ¼ mile area of review of the proposed well location and requests that the application be placed on the docket for the MBOGC hearing scheduled December 5, 2024.

If you have any questions concerning the enclosed application, please contact myself at (435) 789-1017 or to Mark Johnson with Phoenix Operating LLC at (303) 548-1953.

Sincerely,

Amy Doebele
Authorized Agent for Phoenix Operating LLC
UELS, LLC

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OCT 30 2024

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

RECEIVED

OCT 30 2024

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

Phoenix Operating - Scadden 1 SWD
BEFORE THE BOARD OF OIL AND GAS CONSERVATION
OF THE STATE OF MONTANA

In the Matter of the application of

Phoenix Operating LLC

for a Class II Injection well permit.

NOTICE OF INTENTION TO APPLY FOR A

CLASS II INJECTION WELL PERMIT

1. Name and address of Applicant:

Phoenix Operating LLC
4643 S. Ulster Street
Suite 1510
Denver, CO 80237

This public legal notice is
scheduled to be published in
the Helena Independent
Record on November 2, 2024
Upon publication, receipt of the
proof of publication will be
provided to MBOGC.

2. Legal Description including County and Approximate
Footages of Surface Location of Proposed Oil and Gas Well:
(and projected bottom-hole location, if a directional or horizontal
well)

Scadden 1 SWD
Surface Hole: 450' FNL 2036' FEL
NENW Section 21, Township 30 North, Range 59 East
Roosevelt County, MT

3. Source of fluids to be injected

Produced water from Three Forks (Bakken) wells

4. Zone or formation into which injection will occur, including
depth

Dakota from 5,332 -5,811'

5. An aquifer exemption will be requested as part of the
application since the proposed injection zone contains water
with less than 10,000 ppm total dissolved solids.

Pursuant to Rules 36.22.1409, Administrative Rules of Montana,
the Montana Board of Oil and Gas Conservation will hold a
public meeting upon the application of Phoenix Operating LLC
for a Class II underground injection permit for the well or project
set forth above. Said hearing will be held at the Montana Board
of Oil & gas Hearing Room at 2535 St. John's Ave. Billings,
Montana, beginning at 9:00 am on Thursday, December 5,
2024.

November 2, 2024 ##### MNAXLP