

DEPARTMENT OF NATURAL RESOURCES
AND CONSERVATION
BOARD OF OIL AND GAS CONSERVATION



GREG GIANFORTE, GOVERNOR

OIL AND GAS CONSERVATION DIVISION

STATE OF MONTANA

October 10, 2025

Kraken Operating, LLC
945 Bunker Hill Rd, Ste 1200
Houston, TX 77024

Re: Demand For Opportunity To Be Heard

Dear Kraken Operating, LLC:

This letter is regarding a demand for opportunity to be heard that was filed in accordance with ARM 36.22.601 concerning Kraken Operating, LLC's notifications published on September 30, 2025, for three applications for permits to drill in Section 31, T28N-R57E, Roosevelt County, Montana.

The request for hearing was filed by Phoenix Operating LLC who is an interested person in the above-mentioned applications for permits to drill. In accordance with ARM 36.22.601, the applications for permits to drill will be referred to the Montana Board of Oil and Gas (Board) at its next regularly scheduled hearing on December 11, 2025. At that time, consideration of the applications for permits to drill will be reviewed by the Board.

If you have any questions, please contact me at (406) 656-0040 or at bjones@mt.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Benjamin Jones".

Benjamin Jones
Administrator / Petroleum Engineer

cc: Ray Noah: rnoah@krakenoil.com
John Lee: jlee@crowleyfleck.com
Don Lee: don@leelawofficepc.com
Mark Johnson: mjohnson@phxoperating.com

359 - 2025

DIVISION OFFICE
1539 11th AVENUE
PO BOX 201601
HELENA, MONTANA 59620-1601
(406) 444-6731

TECHNICAL AND
SOUTHERN FIELD OFFICE
2535 ST. JOHNS AVENUE
BILLINGS, MONTANA 59102-4693
(406) 656-0040

NORTHERN FIELD OFFICE
201 MAIN STREET
PO BOX 690
SHELBY, MONTANA 59474-0690
(406) 434-2422



DON R. LEE | BRIAN D. LEE | ATTORNEYS AT LAW
PHONE 406.434.5244 FAX 406.434.5246 P.O. BOX 790 | 158 MAIN STREET | SHELBY, MONTANA 59474
LEELAWOFFICEPC.COM

October 8, 2025

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

RECEIVED

OCT 14 2025

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

Attention: Ben Jones, Administrator/Petroleum Engineer

Re: Demand for Opportunity to be Heard

***Kraken Operating LLC Application for Permit
to Drill***

Dear Mr. Jones:

Pursuant to A.R.M. 36.22.601(6), Phoenix Operating LLC ("Phoenix"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, hereby demands a hearing on the Kraken Operating LLC ("Kraken") Application for Permit to Drill ("APD") a horizontal Bakken/Three Forks Formation well with a surface location within and upon Lot 4 of Section 31, Township 28 North, Range 57 East, and a bottom hole location within and upon the SE¼SE¼ of Section 24, Township 27 North, Range 56 East. The referenced surface hole location is in Roosevelt County with the bottom hole location in Richland County. The proposed well the subject of the APD is more specifically identified on Exhibit "A" attached to this correspondence and by reference incorporated herein.

The proposed well, which is the subject of the foregoing APD severely impacts the development plans of Phoenix, whose plans are more beneficial to mineral owners and the State of Montana than Kraken's plans. Phoenix has definite capital backed plans to drill four horizontal wells within the 2,560-acre spacing unit in succession, whereas Kraken only plans to drill one well in a four mile spacing unit and no more indefinitely. Phoenix plans for full development, benefiting mineral owners by protecting correlative rights, preventing waste and benefiting the State of Montana by increasing severance taxes. Further, Kraken is not prepared to drill soon as it has not obtained the necessary federal APD, required to drill through the federal acreage, which is leased by Phoenix.

Particularly in light of their surface location, where Kraken intends to drill four (4), four-mile horizontal laterals from one 40 acre parcel, north and south, it is abundantly clear that Kraken's plans are to hold maximum amount acreage with the minimal amount of development which benefits no one but Kraken. Phoenix intends to drill four wells from this 2,560-acre spacing unit alone, which benefits mineral owners, the State Montana and Phoenix, as well as other working interest owners. Phoenix will be filing its own APD for this 2,560-acre spacing unit within the next 60-90 days.

Phoenix believes that approving the well the subject of the Kraken APD establishes bad precedent and negatively impacts the correlative rights of Phoenix and its oil and gas lessors and takes revenue away from the State of Montana.

I can be reached at (406) 450-2540 and Phoenix's representative, Mark Johnson, Vice President – Regulatory Affairs, can be reached at (303) 376-9778.

Sincerely,

LEE LAW OFFICE PC

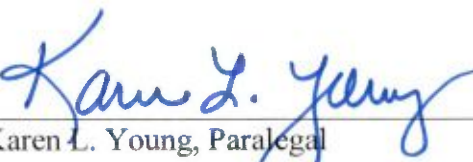
By: 
Don R. Lee

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on October 8, 2025, I served a true and correct copy of the foregoing document to the following:

☒ U.S. Mail
☐ Facsimile
☐ FedEx
☒ E-mail

Kraken Operating LLC
945 Bunker Hill Road, Suite 1200
Houston, TX 77024

By: 
Karen L. Young, Paralegal

Notice of Application

Published in Helena Independent Record on September 30, 2025

EXHIBIT "A"

Location

Lewis and Clark County, Montana

Notice Text

Public Notice

BEFORE THE BOARD OF OIL AND GAS CONSERVATION OF THE STATE
OF MONTANA
NOTICE OF INTENTION TO APPLY FOR PERMIT TO DRILL OIL AND GAS
WELL

In the Matter of the application of Kraken Operating LLC
for a Permit to Drill an oil and gas well.

1. Name and address of Applicant:

Kraken Operating LLC
945 Bunker Hill Road, Suite 1200
Houston, TX 77024

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)

Surface Loc: Lot 4 Section 31, T28N, R57E, Roosevelt County, MT.
Footages: 446' FSL & 374' FWL @ 2101'

Bottom Hole Loc: SESE Section 24, T27N, R56E, Richland County,
MT. Footages: 205' FSL & 650' FWL

3. Total Depth Proposed to be Drilled:

31,220 Measured Depth, 10,042 TVD

Notice is hereby given that an application for permit to drill an oil and gas well at the surface location set forth above to the depth as stated will be filed with the Montana Board of Oil and Gas Conservation. Pursuant to Rules 36.22.601 and 36.22.604, Administrative Rules of Montana, an interested party may demand an opportunity to be heard by the Montana Board of Oil and Gas Conservation concerning the application. SUCH DEMAND FOR HEARING MUST BE RECEIVED BY THE MONTANA BOARD OF OIL AND GAS CONSERVATION AT THE ADDRESS SET FORTH BELOW NO LATER THAN TEN (10) DAYS AFTER THE DATE OF PUBLICATION OF THIS NOTICE. OR THE APPLICATION WILL BE ACTED UPON BY THE BOARD'S PETROLEUM ENGINEER WITHOUT HEARING. A DEMAND MUST: (1) SET FORTH THE NAME, ADDRESS AND TELEPHONE NUMBER OF EACH INTERESTED PARTY, THEIR OWNERSHIP INTEREST IN THE LANDS SURROUNDING THE PROPOSED WELL AND THE REASONS WHY A HEARING IS SOUGHT; (2) BE SERVED UPON THE APPLICANT BY COPY MAILED OR FAX TRANSMITTED TO THE ADDRESS SET FORTH ABOVE.

Montana Board of Oil and Gas Conservation

2535 St. Johns Avenue

Billings MT 59102

Office: (406) 656-0040

Fax: (406) 655-6015

September 30, 2025 COL-MT-201540 MNAXLP

359-2025

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

IN THE MATTER OF THE APPLICATION OF KRAKEN OIL & GAS LLC FOR AN ORDER CREATING A TEMPORARY SPACING UNIT ("TSU") COMPRISED OF ALL OF SECTIONS 26 AND 35, TOWNSHIP 24 NORTH, RANGE 59 EAST, M.P.M., AND ALL OF SECTIONS 2 AND 11, TOWNSHIP 23 NORTH, RANGE 59 EAST, M.P.M., RICHLAND COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT ANY LOCATION NOT CLOSER THAN 200' (HEEL/TOE SETBACK)/500' (LATERAL SETBACK) TO THE BOUNDARIES OF SAID TSU, VACATING MBOGC ORDER NOS. 112-2024 AND 380-2011, AND SUCH OTHER AND FURTHER RELIEF AS THE MBOGC MAY DEEM APPROPRIATE

MBOGC DOCKET NO. 360-2025

APPLICATION

KRAKEN OIL & GAS LLC, 945 Bunker Hill Road, Suite 1200, Houston, Texas 77024:

[A] Presents the following application:

1. Applicant is an interest owner within all or portions of Sections 26 and 35, Township 24 North, Range 59 East, M.P.M., and Sections 2 and 11, Township 23 North, Range 59 East, M.P.M., Richland County, Montana. Said Sections 2, 26 and 35 are presently subject to MBOGC Order No. 112-2024. Said Section 11 is presently subject only to the areawide state spacing order for Bakken/Three Forks production, MBOGC Order No. 380-2011.

2. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill a horizontal Bakken/Three Forks formation well at a location within, but not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries of, a TSU comprised of All of Sections 26 and 35, Township 24 North, Range 59 East, M.P.M., and All of Sections 2 and 11, Township 23 North, Range 59 East, M.P.M. To grant the requested relief, it will be necessary to vacate MBOGC Order No. 112-2024 and, in addition, MBOGC Order No. 380-2011 insofar as it applies to Section 11, Township 23 North, Range 59 East, M.P.M.

3. Applicant will, within 90 days of successful completion of the proposed horizontal operation, file an application for Board consideration of permanent spacing and other matters relating to production from said well.

4. Applicant notes that federal minerals are located within certain tracts affected by this application, namely the SW/4NW/4 of Section 35, Township 24 North, Range 59 East, M.P.M., and the NW/4 and N/2SW/4 of Section 2, Township 23 North, Range 59 East, M.P.M.

[B] Requests:

1. This matter be set for hearing, with notice given as required by law and the MOU;

2. After hearing the matter, the Board enter its order (i) creating a TSU comprised of All of Sections 26 and 35, Township 24 North, Range 59 East, M.P.M., and All of Sections 2 and 11, Township 23 North, Range 59 East, M.P.M., Richland County, Montana, and authorizing the drilling of a horizontal Bakken/Three Forks formation well at any location within such TSU but not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries thereof, providing that operations for the drilling of such well must be commenced within one year from

the date of such order; and (ii) vacating MBOGC Order No. 112-2024 and, in addition, MBOGC Order No. 380-2011 insofar as it applies to Section 11, Township 23 North, Range 59 East, M.P.M.

DATED this 22nd day of October, 2025.

KRAKEN OIL & GAS LLC

By 

John R. Lee, Its Attorney

CROWLEY FLECK PLLP

P.O. Box 2529

Billings, MT 59103-2529

Email: jlee@crowleyfleck.com

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

IN THE MATTER OF THE APPLICATION OF KRAKEN OIL & GAS LLC FOR AN ORDER AUTHORIZING THE DRILLING OF UP TO THREE ADDITIONAL HORIZONTAL BAKKEN/THREE FORKS FORMATION WELLS IN THE TEMPORARY SPACING UNIT ("TSU") COMPRISED OF ALL OF SECTIONS 26 AND 35, TOWNSHIP 24 NORTH, RANGE 59 EAST, M.P.M., AND ALL OF SECTIONS 2 AND 11, TOWNSHIP 23 NORTH, RANGE 59 EAST, M.P.M., RICHLAND COUNTY, MONTANA, AT ANY LOCATIONS NOT CLOSER THAN 200' (HEEL/TOE SETBACK)/500' (LATERAL SETBACK) TO THE BOUNDARIES THEREOF, AND SUCH OTHER AND FURTHER RELIEF AS THE MBOGC MAY DEEM APPROPRIATE

MBOGC DOCKET NO. 361-2025

APPLICATION

KRAKEN OIL & GAS LLC, 945 Bunker Hill Road, Suite 1200, Houston, Texas 77024:

[A] Presents the following application:

1. Applicant is an interest owner and operator within all or portions of Sections 26 and 35, Township 24 North, Range 59 East, M.P.M., and Sections 2 and 11, Township 23 North, Range 59 East, M.P.M., Richland County, Montana. It is anticipated that said lands will comprise a temporary spacing unit ("TSU") for purposes of Bakken/Three Forks formation production pursuant to Montana Board of Oil and Gas Conservation Order No. __-2025.

2. Applicant requests authority to drill up to three additional horizontal Bakken/Three Forks formation wells within said TSU, at any locations not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries thereof, if in its judgment as operator of the TSU such operations appear reasonable and prudent.

3. Applicant notes that federal minerals are located within certain tracts affected by this application, namely the SW/4NW/4 of Section 35, Township 24 North, Range 59 East, M.P.M., and the NW/4 and N/2SW/4 of Section 2, Township 23 North, Range 59 East, M.P.M.

[B] Requests:

1. This matter be set for hearing, with notice given as required by law and the MOU;

2. After hearing the matter, the Board enter its order authorizing the Applicant to drill up to three additional horizontal Bakken/Three Forks formation wells at any locations within, but not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries of, the TSU comprised of Sections 26 and 35, Township 24 North, Range 59 East, M.P.M., and Sections 2 and 11, Township 23 North, Range 59 East, M.P.M., Richland County, Montana.

DATED this 22nd day of October, 2025.


KRAKEN OIL & GAS LLC

By

John R. Lee, Its Attorney
CROWLEY FLECK PLLP
P.O. Box 2529
Billings, MT 59103-2529
Email: jlee@crowleyfleck.com

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

IN THE MATTER OF THE APPLICATION OF KRAKEN OIL & GAS LLC FOR AN ORDER CREATING A TEMPORARY SPACING UNIT ("TSU") COMPRISED OF ALL OF SECTIONS 7, 8 AND 9, TOWNSHIP 23 NORTH, RANGE 59 EAST, M.P.M., RICHLAND COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT ANY LOCATION NOT CLOSER THAN 200' (HEEL/TOE SETBACK)/500' (LATERAL SETBACK) TO THE BOUNDARIES OF SAID TSU, VACATING MBOGC ORDER NO. 380-2011, AND SUCH OTHER AND FURTHER RELIEF AS THE MBOGC MAY DEEM APPROPRIATE

MBOGC DOCKET NO. 362-2025

APPLICATION

KRAKEN OIL & GAS LLC, 945 Bunker Hill Road, Suite 1200, Houston, Texas 77024:

[A] Presents the following application:

1. Applicant is an interest owner within all or portions of Sections 7, 8 and 9, Township 23 North, Range 59 East, M.P.M., Richland County, Montana. Said Sections 7, 8 and 9 are presently subject only to the areawide state spacing order for Bakken/Three Forks production, MBOGC Order No. 380-2011.

2. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill a horizontal Bakken/Three Forks formation well at a location within, but not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries of, a TSU comprised of All of Sections 7, 8 and 9, Township 23 North, Range 59 East, M.P.M. To grant the requested relief, it will be necessary to vacate MBOGC Order No. 380-2011 insofar as it applies to Sections 7, 8 and 9, Township 23 North, Range 59 East, M.P.M.

3. Applicant will, within 90 days of successful completion of the proposed horizontal operation, file an application for Board consideration of permanent spacing and other matters relating to production from said well.

4. Applicant notes that federal minerals are located within certain tracts affected by this application, namely the E/2SE/4 of Section 9, Township 23 North, Range 59 East, M.P.M.

[B] Requests:

1. This matter be set for hearing, with notice given as required by law and the MOU;

2. After hearing the matter, the Board enter its order (i) creating a TSU comprised of All of Sections 7, 8 and 9, Township 23 North, Range 59 East, M.P.M., Richland County, Montana, and authorizing the drilling of a horizontal Bakken/Three Forks formation well at any location within such TSU but not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries thereof, providing that operations for the drilling of such well must be commenced within one year from the date of such order, and (ii) vacating MBOGC Order No. 380-2011 insofar as it applies to Sections 7, 8 and 9, Township 23 North, Range 59 East, M.P.M.

DATED this 22nd day of October, 2025.

KRAKEN OIL & GAS LLC

A handwritten signature in blue ink, appearing to be "John R. Lee", is written over a horizontal line.

By _____
John R. Lee, Its Attorney

CROWLEY FLECK PLLP

P.O. Box 2529

Billings, MT 59103-2529

Email: jlee@crowleyfleck.com

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

IN THE MATTER OF THE APPLICATION OF KRAKEN OIL & GAS LLC FOR AN ORDER AUTHORIZING THE DRILLING OF UP TO THREE ADDITIONAL HORIZONTAL BAKKEN/THREE FORKS FORMATION WELLS IN THE TEMPORARY SPACING UNIT ("TSU") COMPRISED OF ALL OF SECTIONS 7, 8 AND 9, TOWNSHIP 23 NORTH, RANGE 59 EAST, M.P.M., RICHLAND COUNTY, MONTANA, AT ANY LOCATIONS NOT CLOSER THAN 200' (HEEL/TOE SETBACK)/500' (LATERAL SETBACK) TO THE BOUNDARIES THEREOF, AND SUCH OTHER AND FURTHER RELIEF AS THE MBOGC MAY DEEM APPROPRIATE

MBOGC DOCKET NO. 363-2025

APPLICATION

KRAKEN OIL & GAS LLC, 945 Bunker Hill Road, Suite 1200, Houston, Texas 77024:

[A] Presents the following application:

1. Applicant is an interest owner and operator within all or portions of Sections 7, 8 and 9, Township 23 North, Range 59 East, M.P.M., Richland County, Montana. It is anticipated that said lands will comprise a temporary spacing unit ("TSU") for purposes of Bakken/Three Forks formation production pursuant to Montana Board of Oil and Gas Conservation Order No. __-2025.
2. Applicant requests authority to drill up to three additional horizontal Bakken/Three Forks formation wells within said TSU, at any locations not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries thereof, if in its judgment as operator of the TSU such operations appear reasonable and prudent.
3. Applicant notes that federal minerals are located within certain tracts affected by this application, namely the E/2SE/4 of Section 9, Township 23 North, Range 59 East, M.P.M.

[B] Requests:

1. This matter be set for hearing, with notice given as required by law and the MOU;
2. After hearing the matter, the Board enter its order authorizing the Applicant to drill up to three additional horizontal Bakken/Three Forks formation wells at any locations within, but not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries of, the TSU comprised of Sections 7, 8 and 9, Township 23 North, Range 59 East, M.P.M., Richland County, Montana.

DATED this 22nd day of October, 2025.


KRAKEN OIL & GAS LLC

By _____

John R. Lee, Its Attorney
CROWLEY FLECK PLLP
P.O. Box 2529
Billings, MT 59103-2529
Email: jlee@crowleyfleck.com

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

IN THE MATTER OF THE APPLICATION OF KRAKEN OIL & GAS LLC FOR AN ORDER CREATING A TEMPORARY SPACING UNIT ("TSU") COMPRISED OF ALL OF SECTIONS 13, 14 AND 15, TOWNSHIP 23 NORTH, RANGE 59 EAST, M.P.M., AND ALL OF SECTIONS 17 AND 18, TOWNSHIP 23 NORTH, RANGE 60 EAST, M.P.M., RICHLAND COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT ANY LOCATION NOT CLOSER THAN 200' (HEEL/TOE SETBACK)/500' (LATERAL SETBACK) TO THE BOUNDARIES OF SAID TSU, VACATING MBOGC ORDER NOS. 188-2010 AND 380-2011, AND SUCH OTHER AND FURTHER RELIEF AS THE MBOGC MAY DEEM APPROPRIATE

MBOGC DOCKET NO. 364-2025

APPLICATION

KRAKEN OIL & GAS LLC, 945 Bunker Hill Road, Suite 1200, Houston, Texas 77024:

[A] Presents the following application:

1. Applicant is an interest owner within all or portions of Sections 13, 14, 15 and 24, Township 23 North, Range 59 East, M.P.M., and Sections 17, 18, 19 and 20, Township 23 North, Range 60 East, M.P.M., Richland County, Montana. Said Sections 14 and 15 are subject to MBOGC Order No. 188-2010, while said Sections 13, 24, 17, 18, 19 and 20 are presently subject only to the areawide state spacing order for Bakken/Three Forks production, MBOGC Order No. 380-2011.

2. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill a horizontal Bakken/Three Forks formation well at a location within, but not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries of, a TSU comprised of All of Sections 13, 14 and 15, Township 23 North, Range 59 East, M.P.M., and Sections 17 and 18, Township 23 North, Range 60 East, M.P.M. To grant the requested relief, it will be necessary to vacate MBOGC Order No. 188-2010 and, in addition, MBOGC Order No. 380-2011 insofar as it applies to Sections 13 and 24, Township 23 North, Range 59 East, M.P.M., and Sections 17, 18, 19 and 20, Township 23 North, Range 60 East, M.P.M.

3. Applicant will, within 90 days of successful completion of the proposed horizontal operation, file an application for Board consideration of permanent spacing and other matters relating to production from said well.

4. Applicant notes that federal minerals are located within certain tracts affected by this application, namely the SE/4NE/4 of Section 13, the W/2NE/4, W/2 of Section 15, Township 23 North, Range 59 East, M.P.M., and the SW/4NW/4 of Section 18, Township 23 North, Range 60 East, M.P.M.

[B] Requests:

1. This matter be set for hearing, with notice given as required by law and the MOU;

2. After hearing the matter, the Board enter its order (i) creating a TSU comprised of All of Sections 13, 14 and 15, Township 23 North, Range 59 East, M.P.M., and Sections 17 and 18, Township 23 North, Range 60 East, M.P.M., Richland County, Montana, and authorizing the drilling of a horizontal Bakken/Three Forks formation well at any location within such TSU but not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries thereof, providing that operations for the drilling of such well must be commenced within one year from

the date of such order; and (ii) vacating MBOGC Order No. 188-2010 and, in addition, MBOGC Order No. 380-2011 insofar as it applies to Sections 13 and 24, Township 23 North, Range 59 East, M.P.M., and Sections 17, 18, 19 and 20, Township 23 North, Range 60 East, M.P.M.

DATED this 23rd day of October, 2025.

KRAKEN OIL & GAS LLC



By _____

John R. Lee, Its Attorney

CROWLEY FLECK PLLP

P.O. Box 2529

Billings, MT 59103-2529

Email: jlee@crowleyfleck.com

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

IN THE MATTER OF THE APPLICATION OF KRAKEN OIL & GAS LLC FOR AN ORDER AUTHORIZING THE DRILLING OF UP TO THREE ADDITIONAL HORIZONTAL BAKKEN/THREE FORKS FORMATION WELLS IN THE TEMPORARY SPACING UNIT ("TSU") COMPRISED OF ALL OF SECTIONS 13, 14 AND 15, TOWNSHIP 23 NORTH, RANGE 59 EAST, M.P.M., AND ALL OF SECTIONS 17 AND 18, TOWNSHIP 23 NORTH, RANGE 60 EAST, M.P.M., RICHLAND COUNTY, MONTANA, AT ANY LOCATIONS NOT CLOSER THAN 200' (HEEL/TOE SETBACK)/500' (LATERAL SETBACK) TO THE BOUNDARIES THEREOF, AND SUCH OTHER AND FURTHER RELIEF AS THE MBOGC MAY DEEM APPROPRIATE

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APPLICATION

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2. Applicant requests authority to drill up to three additional horizontal Bakken/Three Forks formation wells within said TSU, at any locations not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries thereof, if in its judgment as operator of the TSU such operations appear reasonable and prudent.

3. Applicant notes that federal minerals are located within certain tracts affected by this application, namely the SE/4NE/4 of Section 13, the W/2NE/4, W/2 of Section 15, Township 23 North, Range 59 East, M.P.M., and the SW/4NW/4 of Section 18, Township 23 North, Range 60 East, M.P.M.

[B] Requests:

1. This matter be set for hearing, with notice given as required by law and the MOU;

2. After hearing the matter, the Board enter its order authorizing the Applicant to drill up to three additional horizontal Bakken/Three Forks formation wells at any locations within, but not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries of, the TSU comprised of Sections 13, 14 and 15, Township 23 North, Range 59 East, M.P.M., and Sections 17 and 18, Township 23 North, Range 60 East, M.P.M., Richland County, Montana.

DATED this 23rd day of October, 2025.


KRAKEN OIL & GAS LLC

By

John R. Lee, Its Attorney

CROWLEY FLECK PLLP

P.O. Box 2529

Billings, MT 59103-2529

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

IN THE MATTER OF THE APPLICATION OF KRAKEN OIL & GAS LLC FOR AN ORDER CREATING A TEMPORARY SPACING UNIT ("TSU") COMPRISED OF ALL OF SECTIONS 22, 23 AND 24, TOWNSHIP 23 NORTH, RANGE 59 EAST, M.P.M., AND ALL OF SECTIONS 19 AND 20, TOWNSHIP 23 NORTH, RANGE 60 EAST, M.P.M., RICHLAND COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT ANY LOCATION NOT CLOSER THAN 200' (HEEL/TOE SETBACK)/500' (LATERAL SETBACK) TO THE BOUNDARIES OF SAID TSU, VACATING MBOGC ORDER NOS. 189-2010 AND 380-2011, AND SUCH OTHER AND FURTHER RELIEF AS THE MBOGC MAY DEEM APPROPRIATE

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APPLICATION

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2. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill a horizontal Bakken/Three Forks formation well at a location within, but not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries of, a TSU comprised of All of Sections 22, 23 and 24, Township 23 North, Range 59 East, M.P.M., and Sections 19 and 20, Township 23 North, Range 60 East, M.P.M. To grant the requested relief, it will be necessary to vacate MBOGC Order No. 189-2010 and, in addition, MBOGC Order No. 380-2011 insofar as it applies to Sections 13 and 24, Township 23 North, Range 59 East, M.P.M., and Sections 17, 18, 19 and 20, Township 23 North, Range 60 East, M.P.M.

3. Applicant will, within 90 days of successful completion of the proposed horizontal operation, file an application for Board consideration of permanent spacing and other matters relating to production from said well.

4. Applicant notes that federal minerals are located within certain tracts affected by this application, namely the SE/4NE/4 of Section 13, and canals in portions of Section 23, Township 23 North, Range 59 East, M.P.M., and the SW/4NW/4 of Section 18, and the S/2 of Section 20, Township 23 North, Range 60 East, M.P.M.

[B] Requests:

1. This matter be set for hearing, with notice given as required by law and the MOU;

2. After hearing the matter, the Board enter its order (i) creating a TSU comprised of All of Sections 22, 23 and 24, Township 23 North, Range 59 East, M.P.M., and Sections 19 and 20, Township 23 North, Range 60 East, M.P.M., Richland County, Montana, and authorizing the drilling of a horizontal Bakken/Three Forks formation well at any location within such TSU but not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries thereof, providing that operations for the drilling of such well must be commenced within one year from

the date of such order; and (ii) vacating MBOGC Order No. 189-2010 and, in addition, MBOGC Order No. 380-2011 insofar as it applies to Sections 13 and 24, Township 23 North, Range 59 East, M.P.M., and Sections 17, 18, 19 and 20, Township 23 North, Range 60 East, M.P.M.

DATED this 23rd day of October, 2025.

KRAKEN OIL & GAS LLC

A handwritten signature in blue ink, appearing to be "John R. Lee", is written over a horizontal line.

By _____
John R. Lee, Its Attorney
CROWLEY FLECK PLLP
P.O. Box 2529
Billings, MT 59103-2529
Email: jlee@crowleyfleck.com

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

IN THE MATTER OF THE APPLICATION OF KRAKEN OIL & GAS LLC FOR AN ORDER AUTHORIZING THE DRILLING OF UP TO THREE ADDITIONAL HORIZONTAL BAKKEN/THREE FORKS FORMATION WELLS IN THE TEMPORARY SPACING UNIT ("TSU") COMPRISED OF ALL OF SECTIONS 22, 23 AND 24, TOWNSHIP 23 NORTH, RANGE 59 EAST, M.P.M., AND ALL OF SECTIONS 19 AND 20, TOWNSHIP 23 NORTH, RANGE 60 EAST, M.P.M., RICHLAND COUNTY, MONTANA, AT ANY LOCATIONS NOT CLOSER THAN 200' (HEEL/TOE SETBACK)/500' (LATERAL SETBACK) TO THE BOUNDARIES THEREOF, AND SUCH OTHER AND FURTHER RELIEF AS THE MBOGC MAY DEEM APPROPRIATE

MBOGC DOCKET NO. 367-2025

APPLICATION

KRAKEN OIL & GAS LLC, 945 Bunker Hill Road, Suite 1200, Houston, Texas 77024:

[A] Presents the following application:

1. Applicant is an interest owner and operator within all or portions of Sections 22, 23 and 24, Township 23 North, Range 59 East, M.P.M., and Sections 19 and 20, Township 23 North, Range 60 East, M.P.M., Richland County, Montana. It is anticipated that said lands will comprise a temporary spacing unit ("TSU") for purposes of Bakken/Three Forks formation production pursuant to Montana Board of Oil and Gas Conservation Order No. ___-2025.

2. Applicant requests authority to drill up to three additional horizontal Bakken/Three Forks formation wells within said TSU, at any locations not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries thereof, if in its judgment as operator of the TSU such operations appear reasonable and prudent.

3. Applicant notes that federal minerals are located within certain tracts affected by this application, namely canals in portions of Section 23, Township 23 North, Range 59 East, M.P.M., and the S/2 of Section 20, Township 23 North, Range 60 East, M.P.M.

[B] Requests:

1. This matter be set for hearing, with notice given as required by law and the MOU;

2. After hearing the matter, the Board enter its order authorizing the Applicant to drill up to three additional horizontal Bakken/Three Forks formation wells at any locations within, but not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries of, the TSU comprised of Sections 22, 23 and 24, Township 23 North, Range 59 East, M.P.M., and Sections 19 and 20, Township 23 North, Range 60 East, M.P.M., Richland County, Montana.

DATED this 23rd day of October, 2025.


KRAKEN OIL & GAS LLC

By

John R. Lee, Its Attorney

CROWLEY FLECK PLLP

P.O. Box 2529

Billings, MT 59103-2529

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

IN THE MATTER OF THE APPLICATION OF KRAKEN OIL & GAS LLC FOR AN ORDER AMENDING MBOGC ORDER NOS. 18-2020, 2-2022, 3-2023, 1-2024 AND 142-2024, WHICH CREATED AN OVERLAPPING TEMPORARY SPACING UNIT ("OTSU") COMPRISED OF ALL OF SECTIONS 22, 27 AND 34, TOWNSHIP 26 NORTH, RANGE 59 EAST, M.P.M., RICHLAND COUNTY, MONTANA, AND AUTHORIZING A BAKKEN/THREE FORKS FORMATION WELL TO BE DRILLED AT ANY LOCATION NOT CLOSER THAN 200' (HEEL/TOE SETBACK)/500' (LATERAL SETBACK) TO THE BOUNDARIES OF SAID TSU, AND SUCH OTHER AND FURTHER RELIEF AS THE MBOGC MAY DEEM APPROPRIATE

MBOGC DOCKET NO. 368-2025

APPLICATION

KRAKEN OIL & GAS LLC, 945 Bunker Hill Road, Suite 1200, Houston, Texas 77024:

[A] Presents the following application:

1. Applicant is an interest owner and operator within all or portions of Sections 22, 27 and 34, Township 26 North, Range 59 East, M.P.M., Richland County, Montana, which tracts comprise an OTSU for horizontal Bakken/Three Forks formation production pursuant to MBOGC Order No. 18-2020.

2. MBOGC Order No. 18-2020 authorized Applicant to drill a horizontal Bakken/Three Forks formation well within, but not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries of, the OTSU comprised of All of Sections 22, 27 and 34, Township 26 North, Range 59 East, M.P.M., but required that such operations be commenced within one year of April 30, 2020. Pursuant to MBOGC Order No. 2-2022, Order No. 18-2020 was amended to provide that drilling operations be commenced not later than February 17, 2023. Pursuant to MBOGC Order No. 3-2023, Order Nos. 18-2020 and 2-2022 were amended to provide that drilling operations be commenced not later than February 17, 2024. Pursuant to MBOGC Order No. 1-2024, Order Nos. 18-2020, 2-2022 and 3-2023 were amended to provide that drilling operations be commenced not later than February 15, 2025. Pursuant to MBOGC Order No. 142-2024, Order Nos. 18-2020, 2-2022, 3-2023 and 1-2024 were amended to provide that drilling operations be commenced not later than February 15, 2026.

3. Despite Applicant's best efforts, drilling operations on the subject OTSU cannot be commenced prior to February 15, 2026. Due to the present low oil price environment, Applicant requests an extension of the drilling requirement set forth in MBOGC Order No. 142-2024 to February 15, 2027.

4. Applicant notes that federal minerals are located within certain tracts affected by this application, namely the S/2SW/4 of Section 22, the NW/4NW/4 of Section 27, and the NW/4NE/4 of Section 34, Township 26 North, Range 59 East, M.P.M.

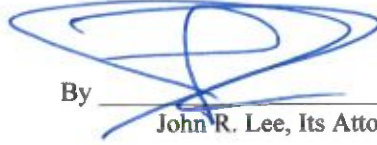
[B] Requests:

1. This matter be set for hearing, with notice given as required by law and the MOU;
2. After hearing the matter, the Board enter its order amending MBOGC Order No. 142-2024 to authorize the drilling of a horizontal Bakken/Three Forks formation well anywhere within the OTSU comprised of All of Sections 22, 27 and 34, Township 26 North, Range 59 East, M.P.M., but not closer than 200' (heel/toe

setback)/500' (lateral setback) to the exterior boundaries thereof, provided that operations for the drilling of such well must be commenced not later than February 15, 2027.

DATED this 22nd day of October, 2025.

KRAKEN OIL & GAS LLC



By _____
John R. Lee, Its Attorney

CROWLEY FLECK PLLP
P.O. Box 2529
Billings, MT 59103-2529

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

IN THE MATTER OF THE APPLICATION OF KRAKEN OIL & GAS LLC FOR AN ORDER AMENDING MBOGC ORDER NO. 147-2024, WHICH CREATED AN OVERLAPPING TEMPORARY SPACING UNIT ("OTSU") COMPRISED OF ALL OF SECTIONS 3, 10 AND 15, TOWNSHIP 26 NORTH, RANGE 57 EAST, M.P.M., AND SECTION 34, TOWNSHIP 27 NORTH, RANGE 57 EAST, M.P.M., RICHLAND AND ROOSEVELT COUNTIES, MONTANA, AND AUTHORIZING A BAKKEN/THREE FORKS FORMATION WELL TO BE DRILLED AT ANY LOCATION NOT CLOSER THAN 200' (HEEL/TOE SETBACK)/500' (LATERAL SETBACK) TO THE BOUNDARIES OF SAID TSU, CLARIFYING MBOGC ORDER NO. 40-2017, VACATING MBOGC ORDER NOS. 301-2010 AND 51-2012, AND SUCH OTHER AND FURTHER RELIEF AS THE MBOGC MAY DEEM APPROPRIATE

MBOGC DOCKET NO. 369-2025

APPLICATION

KRAKEN OIL & GAS LLC, 945 Bunker Hill Road, Suite 1200, Houston, Texas 77024:

[A] Presents the following application:

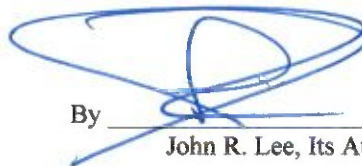
1. Applicant is an interest owner and operator within all or portions of Sections 3, 10 and 15, Township 26 North, Range 57 East, M.P.M., and Section 34, Township 27 North, Range 57 East, M.P.M., Richland and Roosevelt Counties, Montana, which tracts comprise an OTSU for horizontal Bakken/Three Forks formation production pursuant to MBOGC Order No. 147-2024.
2. MBOGC Order No. 147-2024 authorized Applicant to drill a horizontal Bakken/Three Forks formation well within, but not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries of, the OTSU comprised of All of Sections 3, 10 and 15, Township 26 North, Range 57 East, M.P.M., and Section 34, Township 27 North, Range 57 East, M.P.M., but required that such operations be commenced within one year of December 5, 2024.
3. Despite Applicant's best efforts, drilling operations on the subject OTSU cannot be commenced prior to December 5, 2025. Due to the present low oil price environment, Applicant requests an extension of the drilling requirement set forth in MBOGC Order No. 147-2024 to December 10, 2026.
4. Applicant notes that federal minerals are located within certain tracts affected by this application, namely the N/2NE/4, SW/4NE/4, W/2SW/4, NW/4SE/4 of Section 3, and the E/2NE/4, W/2NW/4 and NW/4SW/4 of Section 10, Township 26 North, Range 57 East, M.P.M.

[B] Requests:

1. This matter be set for hearing, with notice given as required by law and the MOU;
2. After hearing the matter, the Board enter its order amending MBOGC Order No. 147-2024 to authorize the drilling of a horizontal Bakken/Three Forks formation well anywhere within the OTSU comprised of All of Sections 3, 10 and 15, Township 26 North, Range 57 East, M.P.M., and Section 34, Township 27 North, Range 57 East, M.P.M., but not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries thereof, provided that operations for the drilling of such well must be commenced not later than December 10, 2026.

DATED this 22nd day of October, 2025.

KRAKEN OIL & GAS LLC

A handwritten signature in blue ink, consisting of several loops and a long horizontal stroke, positioned above a horizontal line.

By

John R. Lee, Its Attorney

CROWLEY FLECK PLLP
P.O. Box 2529
Billings, MT 59103-2529

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

IN THE MATTER OF THE APPLICATION OF KRAKEN OIL & GAS LLC FOR AN ORDER AMENDING MBOGC ORDER NO. 149-2024, WHICH CREATED A TEMPORARY SPACING UNIT ("TSU") COMPRISED OF ALL OF SECTIONS 30 AND 31, TOWNSHIP 27 NORTH, RANGE 57 EAST, M.P.M., AND ALL OF SECTIONS 6 AND 7, TOWNSHIP 26 NORTH, RANGE 57 EAST, M.P.M., RICHLAND COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT ANY LOCATION NOT CLOSER THAN 200' (HEEL/TOE SETBACK)/500' (LATERAL SETBACK) TO THE BOUNDARIES OF SAID TSU, VACATING MBOGC ORDER NOS. 416-2011 AND 96-2011, AND SUCH OTHER AND FURTHER RELIEF AS THE MBOGC MAY DEEM APPROPRIATE

MBOGC DOCKET NO. 370-2025

APPLICATION

KRAKEN OIL & GAS LLC, 945 Bunker Hill Road, Suite 1200, Houston, Texas 77024:

[A] Presents the following application:

1. Applicant is an interest owner and operator within all or portions of Sections 30 and 31, Township 27 North, Range 57 East, M.P.M., and Sections 6 and 7, Township 26 North, Range 57 East, M.P.M., Richland County, Montana, which tracts comprise a TSU for horizontal Bakken/Three Forks formation production pursuant to MBOGC Order No. 149-2024.
2. MBOGC Order No. 149-2024 authorized Applicant to drill a horizontal Bakken/Three Forks formation well within, but not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries of, the TSU comprised of All of Sections 30 and 31, Township 27 North, Range 57 East, M.P.M., and Sections 6 and 7, Township 26 North, Range 57 East, M.P.M., but required that such operations be commenced within one year of December 5, 2024.
3. Despite Applicant's best efforts, drilling operations on the subject TSU cannot be commenced prior to December 5, 2025. Due to the present low oil price environment, Applicant requests an extension of the drilling requirement set forth in MBOGC Order No. 149-2024 to December 10, 2026.
4. Applicant notes that federal minerals are located within certain tracts affected by this application, namely the N/2NE/4, SW/4NE/4, NW/4 and SE/4SW/4 of Section 30, the NW/4, N/2SW/4 and SW/4SW/4 of Section 31, Township 27 North, Range 57 East, M.P.M., the E/2NE/4, NW/4NW/4, W/2SW/4 and W/2SE/4 of Section 6, and the N/2, NE/4SW/4 and N/2SE/4 of Section 7, Township 26 North, Range 57 East, M.P.M.


[B] Requests:

1. This matter be set for hearing, with notice given as required by law and the MOU;
2. After hearing the matter, the Board enter its order amending MBOGC Order No. 149-2024 to authorize the drilling of a horizontal Bakken/Three Forks formation well anywhere within the TSU comprised of All of All of Sections 30 and 31, Township 27 North, Range 57 East, M.P.M., and Sections 6 and 7, Township 26 North, Range 57 East, M.P.M., but not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior

boundaries thereof, provided that operations for the drilling of such well must be commenced not later than December 10, 2026.

DATED this 22nd day of October, 2025.

KRAKEN OIL & GAS LLC



By _____
John R. Lee, Its Attorney

CROWLEY FLECK PLLP
P.O. Box 2529
Billings, MT 59103-2529

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

IN THE MATTER OF THE APPLICATION OF KRAKEN OIL & GAS LLC FOR AN ORDER AMENDING MBOGC ORDER NO. 151-2024, WHICH CREATED A TEMPORARY SPACING UNIT ("TSU") COMPRISED OF ALL OF SECTIONS 15, 22 AND 27, TOWNSHIP 24 NORTH, RANGE 59 EAST, M.P.M., RICHLAND COUNTY, MONTANA, AND AUTHORIZING A BAKKEN/THREE FORKS FORMATION WELL TO BE DRILLED AT ANY LOCATION NOT CLOSER THAN 200' (HEEL/TOE SETBACK)/500' (LATERAL SETBACK) TO THE BOUNDARIES OF SAID TSU, AND SUCH OTHER AND FURTHER RELIEF AS THE MBOGC MAY DEEM APPROPRIATE

MBOGC DOCKET NO. 371-2025

APPLICATION

KRAKEN OIL & GAS LLC, 945 Bunker Hill Road, Suite 1200, Houston, Texas 77024:

[A] Presents the following application:

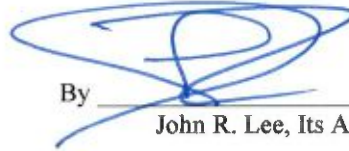
1. Applicant is an interest owner and operator within all or portions of Sections 15, 22 and 27, Township 24 North, Range 59 East, M.P.M., Richland County, Montana, which tracts comprise a TSU for horizontal Bakken/Three Forks formation production pursuant to MBOGC Order No. 151-2024.
2. MBOGC Order No. 151-2024 authorized Applicant to drill a horizontal Bakken/Three Forks formation well within, but not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries of, the TSU comprised of All of Sections 15, 22 and 27, Township 24 North, Range 59 East, M.P.M., but required that such operations be commenced within one year of December 5, 2024.
3. Despite Applicant's best efforts, drilling operations on the subject TSU cannot be commenced prior to December 5, 2025. Due to the present low oil price environment, Applicant requests an extension of the drilling requirement set forth in MBOGC Order No. 151-2024 to December 10, 2026.
4. Applicant notes that there do not appear to be any federal minerals affected by this application.

[B] Requests:

1. This matter be set for hearing, with notice given as required by law and the MOU;
2. After hearing the matter, the Board enter its order amending MBOGC Order No. 151-2024 to authorize the drilling of a horizontal Bakken/Three Forks formation well anywhere within the TSU comprised of All of Sections 15, 22 and 27, Township 24 North, Range 59 East, M.P.M., but not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries thereof, provided that operations for the drilling of such well must be commenced not later than December 10, 2026.

DATED this 22nd day of October, 2025.

KRAKEN OIL & GAS LLC

A handwritten signature in blue ink, appearing to be 'J. Lee', is written over a horizontal line.

By

John R. Lee, Its Attorney

CROWLEY FLECK PLLP
P.O. Box 2529
Billings, MT 59103-2529

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

IN THE MATTER OF THE APPLICATION OF KRAKEN OIL & GAS LLC FOR AN ORDER AMENDING MBOGC ORDER NO. 157-2024, WHICH CREATED A TEMPORARY SPACING UNIT ("TSU") COMPRISED OF ALL OF SECTIONS 3, 10, 15 AND 22, TOWNSHIP 24 NORTH, RANGE 58 EAST, M.P.M., RICHLAND COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT ANY LOCATION NOT CLOSER THAN 200' (HEEL/TOE SETBACK)/500' (LATERAL SETBACK) TO THE BOUNDARIES OF SAID TSU, VACATING MBOGC ORDER NOS. 267-2014 AND 377-2012, AND SUCH OTHER AND FURTHER RELIEF AS THE MBOGC MAY DEEM APPROPRIATE

MBOGC DOCKET NO. 372-2025

APPLICATION

KRAKEN OIL & GAS LLC, 945 Bunker Hill Road, Suite 1200, Houston, Texas 77024;

[A] Presents the following application:

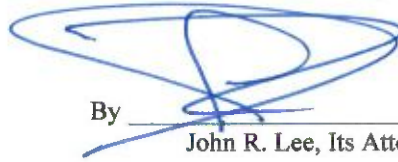
1. Applicant is an interest owner and operator within all or portions of Sections 3, 10, 15 and 22, Township 24 North, Range 58 East, M.P.M., Richland County, Montana, which tracts comprise a TSU for horizontal Bakken/Three Forks formation production pursuant to MBOGC Order No. 157-2024.
2. MBOGC Order No. 157-2024 authorized Applicant to drill a horizontal Bakken/Three Forks formation well within, but not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries of, the TSU comprised of All of Sections 3, 10, 15 and 22, Township 24 North, Range 58 East, M.P.M., but required that such operations be commenced within one year of December 5, 2024.
3. Despite Applicant's best efforts, it is possible that operations for the drilling of such well in the subject TSU might not be commenced prior to December 5, 2025. Applicant therefore requests an extension of the drilling requirement set forth in MBOGC Order No. 157-2024 to December 10, 2026.
4. Applicant notes that federal minerals are located within certain tracts affected by this application, namely the SW/4SW/4 of Section 15, Township 24 North, Range 58 East, M.P.M.

[B] Requests:

1. This matter be set for hearing, with notice given as required by law and the MOU;
2. After hearing the matter, the Board enter its order amending MBOGC Order No. 157-2024 to authorize the drilling of a horizontal Bakken/Three Forks formation well anywhere within the TSU comprised of All of Sections 3, 10, 15 and 22, Township 24 North, Range 58 East, M.P.M., but not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries thereof, provided that operations for the drilling of such well must be commenced not later than December 10, 2026.

DATED this 22nd day of October, 2025.

KRAKEN OIL & GAS LLC

A handwritten signature in blue ink, consisting of several loops and a long horizontal stroke extending to the right.

By

John R. Lee, Its Attorney

CROWLEY FLECK PLLP
P.O. Box 2529
Billings, MT 59103-2529

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

IN THE MATTER OF THE APPLICATION OF KRAKEN OIL & GAS LLC FOR AN ORDER AMENDING MBOGC ORDER NO. 159-2024, WHICH CREATED A TEMPORARY SPACING UNIT ("TSU") COMPRISED OF ALL OF SECTIONS 4, 9, 16 AND 21, TOWNSHIP 24 NORTH, RANGE 58 EAST, M.P.M., RICHLAND COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT ANY LOCATION NOT CLOSER THAN 200' (HEEL/TOE SETBACK)/500' (LATERAL SETBACK) TO THE BOUNDARIES OF SAID TSU, VACATING MBOGC ORDER NOS. 268-2014 AND 375-2012, AND SUCH OTHER AND FURTHER RELIEF AS THE MBOGC MAY DEEM APPROPRIATE

MBOGC DOCKET NO. 373-2025

APPLICATION

KRAKEN OIL & GAS LLC, 945 Bunker Hill Road, Suite 1200, Houston, Texas 77024:

[A] Presents the following application:

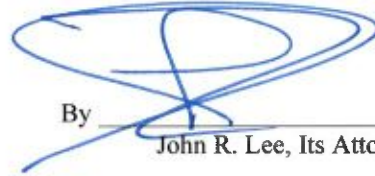
1. Applicant is an interest owner and operator within all or portions of Sections 4, 9, 16 and 21, Township 24 North, Range 58 East, M.P.M., Richland County, Montana, which tracts comprise a TSU for horizontal Bakken/Three Forks formation production pursuant to MBOGC Order No. 159-2024.
2. MBOGC Order No. 159-2024 authorized Applicant to drill a horizontal Bakken/Three Forks formation well within, but not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries of, the TSU comprised of All of Sections 4, 9, 16 and 21, Township 24 North, Range 58 East, M.P.M., but required that such operations be commenced within one year of December 5, 2024.
3. Despite Applicant's best efforts, it is possible that operations for the drilling of such well in the subject TSU might not be commenced prior to December 5, 2025. Applicant therefore requests an extension of the drilling requirement set forth in MBOGC Order No. 157-2024 to December 10, 2026.
4. Applicant notes that there do not appear to be any federal minerals affected by this application.

[B] Requests:

1. This matter be set for hearing, with notice given as required by law and the MOU;
2. After hearing the matter, the Board enter its order amending MBOGC Order No. 159-2024 to authorize the drilling of a horizontal Bakken/Three Forks formation well anywhere within the TSU comprised of All of Sections 4, 9, 16 and 21, Township 24 North, Range 58 East, M.P.M., but not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries thereof, provided that operations for the drilling of such well must be commenced not later than December 10, 2026.

DATED this 22nd day of October, 2025.

KRAKEN OIL & GAS LLC

A handwritten signature in blue ink, consisting of several loops and a long horizontal stroke extending to the right.

By

John R. Lee, Its Attorney

CROWLEY FLECK PLLP
P.O. Box 2529
Billings, MT 59103-2529

DEPARTMENT OF NATURAL RESOURCES
AND CONSERVATION
BOARD OF OIL AND GAS CONSERVATION



GREG GIANFORTE, GOVERNOR

OIL AND GAS CONSERVATION DIVISION

STATE OF MONTANA

November 3, 2025

Heritage Energy Operating LLC
2448 E. 81st Street Suite 2036
Tulsa, OK 74137

Re: Demand For Opportunity to Be Heard

Dear Heritage Energy Operating LLC:

This letter is regarding a demand for opportunity to be heard that was filed in accordance with ARM 36.22.601 concerning Heritage Energy Operating, LLC's (Heritage) published notifications of the State 15-10-3 2H, State 15-10-3 3H, State 15-10-3 4H, W. Poff Trust 14-11-2 1H, and the W. Poff Trust 14-11-2 2H well applications for permits to drill and the renewal of the application for permit to drill of the State 15-10-3 1H well that expired November 2, 2025.

The request for hearing was filed by Phoenix Operating LLC who is an interested person in the above-mentioned applications for permits to drill. In accordance with ARM 36.22.601, the applications for permits to drill will be referred to the Montana Board of Oil and Gas (Board) at its next regularly scheduled hearing on December 11, 2025. At that time, consideration of the applications for permits to drill will be reviewed by the Board.

If you have any questions, please contact me at (406) 656-0040 or at bjones@mt.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Benjamin Jones".

Benjamin Jones
Administrator / Petroleum Engineer

cc: Josh Cornell: joshc@heritageenergyllc.com
Uriah Price: uprice@crowleyfleck.com
Don Lee: don@leelawofficepc.com
Mark Johnson: mjohnson@phxoperating.com

374-2025

DIVISION OFFICE
1539 11th AVENUE
PO BOX 201601
HELENA, MONTANA 59620-1601
(406) 444-6731

TECHNICAL AND
SOUTHERN FIELD OFFICE
2535 ST. JOHNS AVENUE
BILLINGS, MONTANA 59102-4693
(406) 656-0040

NORTHERN FIELD OFFICE
201 MAIN STREET
PO BOX 690
SHELBY, MONTANA 59474-0690
(406) 434-2422



November 4, 2025

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

RECEIVED

NOV 07 2025

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

Attention: Ben Jones, Administrator/Petroleum Engineer

**Re: *Permit Protest re In the Matter of State 15-10-3 1H,
Heritage Energy Operating LLC, for a Renewal of
Permit to Drill an Oil and Gas Well***

Dear Mr. Jones:

Phoenix Operating LLC ("Phoenix"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, hereby protests and requests a hearing on the Application of Heritage Energy Operating LLC ("Heritage") for a renewal of the Permit to Drill the State 15-10-3 1H in all of Sections 3, 10, and 15, Township 25 North, Range 56 East, Richland County, Montana on the following grounds:

1. Phoenix owns an estimated 62.33% working interest in Sections 1, 12 and 13, 51.03% working interest in Sections 3, 10 and 15, and 25.73% working interest in Sections 2, 11 and 14, all in Township 25 North, Range 56 East, Richland County, Montana.
2. Phoenix protests on the basis that awarding a permit to drill to Heritage for a spacing unit comprised of all of Sections 3, 10, and 15 T25N, R56E (Order 49-2025) does not promote the most orderly and efficient development of the oil and gas resource and may result in economic and physical waste as well as a violation of correlative rights to the owners of the surrounding area.
3. Phoenix plans to drill four wells in a spacing unit comprised of all of Sections 1, 12, and 13, T25N, R56E, four wells in a spacing unit comprised of all of Sections 2, 11, and 14 T25N, R56E, and four wells in a spacing unit comprised of all of Sections 3, 10 and 15, T25N, R56E, all in the year 2026. Phoenix's development plan results in production from twelve wells for owners in nine

sections. While Heritage has submitted three separate permits for these spacing units, all have either expired (State 15-10-3 1H on November 2, 2025), or are set to expire by December 19, 2025 (W. Poff Trust 14-11-2 4H) and January 24, 2026 (E. Poff Trust 13-12-1 1H), and Heritage has drilled none, and upon information and belief Heritage will drill none.

4. Heritage has recently submitted additional permits to drill additional wells within these spacing units, even though it has not utilized its expired or expiring permits. Allowing Heritage to proceed with the proposed permits encumbers nine sections with permits that may never be utilized, or underutilized by unknown third parties by, for example, drilling only one well within each spacing unit, and waiting for an indefinite future time while additional permits are applied for renewal, or not utilized.
5. Heritage has permitted no less than 11 wells in the State of Montana with renewing 9 of those 11 permits, and to date has drilled zero wells, and has obtained no production.
6. In contrast, Phoenix plans for full development, benefiting mineral owners by protecting correlative rights, preventing waste and benefiting the State of Montana by increasing severance taxes. Phoenix intends to drill four wells from this spacing unit alone, which benefits mineral owners, the State Montana and Phoenix, as well as other working interest owners. Phoenix's usual mode of operation is to drill as many wells as are allowable under spacing orders in succession in Montana and North Dakota.
7. The State 15-10-3 1H permit has been active since May 2, 2025. Heritage has had time to drill the State 15-10-3 1H well. Heritage's failure to develop under the State 15-10-3 1H while requesting a renewal of this permit and submission of additional permits while failing to drill is a deterrent to development, makes development more expensive by driving up the costs of development by a third party, and does not promote the conservation of oil and gas, the prevention of waste, or the protection of correlative rights.
8. Upon information and belief, it is Phoenix's understanding that Heritage has no intention of drilling and operating the State 15-10-3 1H well; rather to obtain an acreage position through the permitting process and to flip the acreage to a third party.
9. Phoenix will be filing its own APDs for the spacing units referenced above before the Board's December hearing and in time for the Board to review Phoenix's plans in contrast to Heritage's.

RECEIVED

NOV 07 2025

MONTANA BOARD OF OIL &
GAS CONSERVATION - BILLINGS

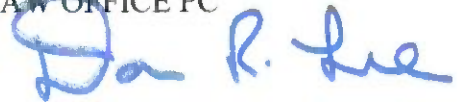
374-2025

10. Phoenix notes that recent temporary spacing orders issued by the Montana Board of Oil & Gas Conservation Commission ("MBOGC") require commencement of operations within one year of the issuance of said order. Thus, it is evident that the MBOGC shares Phoenix's concern that stagnant permits and temporary spacing orders can indirectly condemn lands otherwise available for development.
11. Should Heritage's permit renewal be approved, Phoenix, the majority working interest owner in two of the three spacing units, would delay development in Sections 1, 12, and 13, in Sections 2, 11, and in Sections 3, 10 and 15, all in T25N, R56E. Thus, Heritage's permit to flip plans affects owners across nine sections.

I can be reached at (406) 450-2540 and Phoenix's representative, Mark Johnson, Vice President – Regulatory Affairs, can be reached at (303) 548-1953.

Sincerely,

LEE LAW OFFICE PC



By: _____

Don R. Lee

DRL/kly

RECEIVED

NOV 07 2025

MONTANA BOARD OF OIL & GAS CONSERVATION • BUTTE, MT

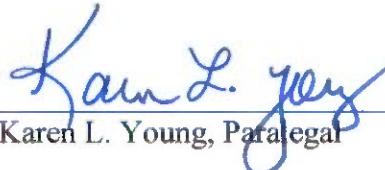
CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on November 4, 2025, I served a true and correct copy of the foregoing document to the following:

☒ U.S. Mail
☒ Facsimile
☐ FedEx
☒ E-mail

Heritage Energy Operating LLC
Attention: Josh Cornell, CEO
2448 E. 81st St., Suite 3600
Tulsa, OK 74137

By:


Karen L. Young, Paralegal

RECEIVED

NOV 07 2025

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS



DON R. LEE | BRIAN D. LEE | ATTORNEYS AT LAW
PHONE 406.434.5244 FAX 406.434.5246 P.O. BOX 790 | 158 MAIN STREET | SHELBY, MONTANA 59474
LEELAWOFFICEPC.COM

October 28, 2025

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

RECEIVED

OCT 30 2025

Attention: Ben Jones, Administrator/Petroleum Engineer

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

Re: Demand for Opportunity to be Heard

***Heritage Energy Operating, LLC Application for Permit
to Drill – State 15-10-3 2H***

Dear Mr. Jones:

Pursuant to A.R.M. 36.22.601(6), Phoenix Operating LLC ("Phoenix"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, hereby demands a hearing before the Board of Oil and Gas Conservation of the State of Montana ("MBOGC") on the Heritage Energy Operating LLC ("Heritage") Application for Permit to Drill ("APD") a horizontal Bakken/Three Forks Formation well with a surface location within and upon SW $\frac{1}{4}$ SE $\frac{1}{4}$ of Section 15, Township 25 North, Range 56 East, and a bottom hole location within and upon the NW $\frac{1}{4}$ NW $\frac{1}{4}$ of Section 3, Township 25 North, Range 56 East, being the State 15-10-3 2H well ("Proposed Subject Well"). The referenced surface hole location and bottom hole location are in Richland County. The Proposed Subject Well is more specifically identified on Exhibit "A" attached to this correspondence and by reference incorporated herein.

Heritage has an existing permit in this drilling and spacing unit consisting of all of Sections 3, 10 and 15 in Township 25 North, Range 56 East by Commission Order No. 49-2025 ("DSU") being the State 15-10-3 1H well (API No. 25-083-23497-00-00). Heritage has not utilized this existing permit and upon information and belief has no intention of drilling its existing permit which expires November 2, 2025. Heritage should not be rewarded with more permits, when it hasn't utilized the permit it currently holds. In fact Heritage has permitted no less than 11 wells in the State of Montana with renewing 9 of those 11 permits, and to date has drilled zero wells, and has

374-2025

obtained no production. Upon information and belief, Heritage has no intention of nor definite plans to utilize the APD for the Proposed Subject Well, rather it intends to flip the acreage covered by the Proposed Subject Well by selling it to a to-be-determined buyer. As a result, the MBOGC has no way of assessing whether granting the APD will protect correlative rights or prevent waste because Heritage will not be utilizing the APD for anything but a sale to a third party. Further, Heritage has not obtained the necessary federal APD, required to drill through the federal acreage in the DSU, which is leased by Phoenix.

In contrast, Phoenix currently owns 51.03% of the working interest in the DSU with plans to acquire more. Phoenix has definite capital backed plans to drill four horizontal wells within the DSU in succession in 2026. Phoenix plans for full development, benefiting mineral owners by protecting correlative rights, preventing waste and benefiting the State of Montana by increasing severance taxes. Phoenix intends to drill four wells from this DSU alone, which benefits mineral owners, the State Montana and Phoenix, as well as other working interest owners. Phoenix's usual mode of operation is to drill as many wells as are allowable under spacing orders in succession in Montana and North Dakota. Phoenix will be filing its own APDs for the DSU before the MBOGC's December hearing and in time for the MBOGC to review Phoenix's plans in contrast to Heritage's. The Proposed Subject Well severely impacts the development plans of Phoenix, which plans are more beneficial to mineral owners and the State of Montana than Heritage's plans.

Phoenix believes that approving the Proposed Well APD of Heritage establishes bad precedent and negatively impacts the correlative rights of Phoenix and its oil and gas lessors and takes revenue away from the State of Montana.

I can be reached at (406) 450-2540 and Phoenix's representative, Mark Johnson, Vice President – Regulatory Affairs, can be reached at (303) 548-1953.

Sincerely,

LEE LAW OFFICE PC

By: 
Don R. Lee

DRL/kly

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on October 28, 2025, I served a true and correct copy of the foregoing document to the following:

☒ U.S. Mail
☒ Facsimile
☐ FedEx
☒ E-mail

Heritage Energy Operating LLC
Attention: Josh Cornell, CEO
2448 E. 81st St., Suite 3600
Tulsa, OK 74137

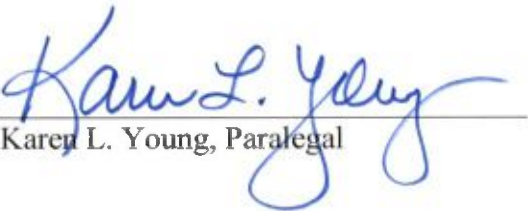
By: 
Karen L. Young, Paralegal

EXHIBIT "A"

Notice of Application

Published in Helena Independent Record on October 21, 2025

Location

Lewis and Clark County, Montana

Notice Text

Notice of Permit to Drill

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

In the Matter of the application of

State 15-10-3 2H

Heritage Energy Operating, LLC

for a Permit to Drill an oil and gas well.

NOTICE OF INTENTION TO APPLY

FOR PERMIT TO DRILL

OIL AND GAS WELL

1. Name and address of Applicant:

Heritage Energy Operating, LLC

2448 E. 81st Street, Suite 3600

Tulsa, OK 74137

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)

Richland County, MT

SHL: S98° FSL, 1,960 FEL, Sec. 15, T25N-R56E SWSE

BHL: 200' FNL, 580' FWL, Sec. 3, T25N-R56E NWNW

3. Total Depth Proposed to be Drilled:

26,011' MD, 10,161' TVD

Notice is hereby given that an application for permit to drill an oil and
gas well at the surface location set forth above to the depth as stated
will be filed with the Montana Board of Oil and Gas Conservation.

Pursuant to Rules 36.22.601 and 36.22.604, Administrative Rules of
Montana, an interested party may demand an opportunity to be heard
by the Montana Board of Oil and Gas Conservation concerning the
application. SUCH DEMAND FOR HEARING MUST BE RECEIVED BY THE
MONTANA BOARD OF OIL AND GAS CONSERVATION AT THE ADDRESS
SET FORTH BELOW NO LATER THAN TEN (10) DAYS AFTER THE DATE
OF PUBLICATION OF THIS NOTICE. OR THE APPLICATION WILL BE
ACTED UPON BY THE BOARD'S PETROLEUM ENGINEER WITHOUT
HEARING. A DEMAND MUST: (1) SET FORTH THE NAME, ADDRESS
AND TELEPHONE NUMBER OF EACH INTERESTED PARTY, THEIR
OWNERSHIP INTEREST IN THE LANDS SURROUNDING THE PROPOSED
WELL AND THE REASONS WHY A HEARING IS SOUGHT; (2) BE SERVED
UPON THE APPLICANT BY COPY MAILED OR FAX TRANSMITTED TO
THE ADDRESS SET FORTH ABOVE; AND (3) A CERTIFICATE OF SERVICE
MUST ACCOMPANY THE DEMAND AS FILED WITH THE BOARD.

Montana Board of Oil and Gas Conservation

2535 St. Johns Avenue

Billings MT 59102

Office: (406) 656-0040

Fax: (406) 652-5305

October 21, 2025 COL-MT-201599 MNAXLP



DON R. LEE | BRIAN D. LEE | ATTORNEYS AT LAW
PHONE 406.434.5244 FAX 406.434.5246 P.O. BOX 790 | 158 MAIN STREET | SHELBY, MONTANA 59474
LEELAWOFFICEPC.COM

October 28, 2025

RECEIVED

OCT 30 2025

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

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

Attention: Ben Jones, Administrator/Petroleum Engineer

Re: Demand for Opportunity to be Heard

***Heritage Energy Operating, LLC Application for Permit
to Drill – State 15-10-3 3H***

Dear Mr. Jones:

Pursuant to A.R.M. 36.22.601(6), Phoenix Operating LLC ("Phoenix"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, hereby demands a hearing before the Board of Oil and Gas Conservation of the State of Montana ("MBOGC") on the Heritage Energy Operating LLC ("Heritage") Application for Permit to Drill ("APD") a horizontal Bakken/Three Forks Formation well with a surface location within and upon SW $\frac{1}{4}$ SE $\frac{1}{4}$ of Section 15, Township 25 North, Range 56 East, and a bottom hole location within and upon the NE $\frac{1}{4}$ NW $\frac{1}{4}$ of Section 3, Township 25 North, Range 56 East, being the State 15-10-3 3H well ("Proposed Subject Well"). The referenced surface hole location is in Richland County with the bottom hole location in Richland County. The Proposed Subject Well is more specifically identified on Exhibit "A" attached to this correspondence and by reference incorporated herein.

Heritage has an existing permit in this drilling and spacing unit consisting of all of Sections 3, 10 and 15 in Township 25 North, Range 56 East by Commission Order No. 49-2025 ("DSU") being for the State 15-10-3 1H well (API No. 25-083-23497-00-00). Heritage has not utilized this existing permit and upon information and belief has no intention of drilling its existing permit which expires November 2, 2025. Heritage should not be rewarded with more permits, when it hasn't utilized the permit it currently holds. In fact Heritage has permitted no less than 11 wells in the State of Montana with renewing 9 of those 11 permits, and to date has drilled zero wells, and has

374-2025

has obtained no production. Upon information and belief, Heritage has no intention of nor definite plans to utilize the APD for the Proposed Subject Well, rather it intends to flip the acreage covered by the Proposed Subject Well by selling it to a to-be-determined buyer. As a result, the MBOGC has no way of assessing whether granting the APD will protect correlative rights or prevent waste because Heritage will not be utilizing the APD for anything but a sale to a third party. Further, Heritage has not obtained the necessary federal APD, required to drill through the federal acreage in the DSU, which is leased by Phoenix.

In contrast, Phoenix currently owns 51.03% of the working interest in the DSU with plans to acquire more. Phoenix has definite capital backed plans to drill four horizontal wells within the DSU in succession in 2026. Phoenix plans for full development, benefiting mineral owners by protecting correlative rights, preventing waste and benefiting the State of Montana by increasing severance taxes. Phoenix intends to drill four wells from this DSU alone, which benefits mineral owners, the State Montana and Phoenix, as well as other working interest owners. Phoenix's usual mode of operation is to drill as many wells as are allowable under spacing orders in succession in Montana and North Dakota. Phoenix will be filing its own APDs for the DSU before the MBOGC's December hearing and in time for the MBOGC to review Phoenix's plans in contrast to Heritage's. The Proposed Subject Well severely impacts the development plans of Phoenix, which plans are more beneficial to mineral owners and the State of Montana than Heritage's plans.

Phoenix believes that approving the Proposed Well APD of Heritage establishes bad precedent and negatively impacts the correlative rights of Phoenix and its oil and gas lessors and takes revenue away from the State of Montana.

I can be reached at (406) 450-2540 and Phoenix's representative, Mark Johnson, Vice President – Regulatory Affairs, can be reached at (303) 548-1953.

Sincerely,

LEE LAW OFFICE PC

By: 
Don R. Lee

DRL/kly

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on October 28, 2025, I served a true and correct copy of the foregoing document to the following:

[X] U.S. Mail
[X] Facsimile
[] FedEx
[X] E-mail

Heritage Energy Operating LLC
Attention: Josh Cornell, CEO
2448 E. 81st St., Suite 3600
Tulsa, OK 74137

By: _____


Karen L. Young, Paralegal

EXHIBIT "A"

Notice of Application

Published in Helena Independent Record on October 21, 2025

Location

Lewis and Clark County, Montana

Notice Text

Notice of Permit to Drill

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

In the Matter of the application of

State 15-10-3 3H

Heritage Energy Operating, LLC
for a Permit to Drill an oil and gas well.

**NOTICE OF INTENTION TO APPLY
FOR PERMIT TO DRILL
OIL AND GAS WELL**

1. Name and address of Applicant:

**Heritage Energy Operating, LLC
2448 E. 81st Street, Suite 3600
Tulsa, OK 74137**

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)

Richland County, MT

SHL: 631' FSL, 1,960' FEL, Sec. 15, T25N-R56E SWSE

BHL: 200' FNL, 1,980' FWL, Sec. 3, T25N-R56E NENW

3. Total Depth Proposed to be Drilled:

25,653' MD, 10,161' TVD

Notice is hereby given that an application for permit to drill an oil and gas well at the surface location set forth above to the depth as stated will be filed with the Montana Board of Oil and Gas Conservation. Pursuant to Rules 36.22.601 and 36.22.604, Administrative Rules of Montana, an interested party may demand an opportunity to be heard by the Montana Board of Oil and Gas Conservation concerning the application. SUCH DEMAND FOR HEARING MUST BE RECEIVED BY THE MONTANA BOARD OF OIL AND GAS CONSERVATION AT THE ADDRESS SET FORTH BELOW NO LATER THAN TEN (10) DAYS AFTER THE DATE OF PUBLICATION OF THIS NOTICE, OR THE APPLICATION WILL BE ACTED UPON BY THE BOARD'S PETROLEUM ENGINEER WITHOUT HEARING. A DEMAND MUST: (1) SET FORTH THE NAME, ADDRESS AND TELEPHONE NUMBER OF EACH INTERESTED PARTY, THEIR OWNERSHIP INTEREST IN THE LANDS SURROUNDING THE PROPOSED WELL, AND THE REASONS WHY A HEARING IS SOUGHT; (2) BE SERVED UPON THE APPLICANT BY COPY MAILED OR FAX TRANSMITTED TO THE ADDRESS SET FORTH ABOVE; AND (3) A CERTIFICATE OF SERVICE MUST ACCOMPANY THE DEMAND AS FILED WITH THE BOARD.

Montana Board of Oil and Gas Conservation

2535 St. Johns Avenue

Billings MT 59102

Office: (406) 656-0040

Fax: (406) 652-5305

October 21, 2025 COL-MT-201600 MNAXLP

374-2025



DON R. LEE | BRIAN D. LEE | ATTORNEYS AT LAW
PHONE 406.434.5244 FAX 406.434.5246 P.O. BOX 790 | 158 MAIN STREET | SHELBY, MONTANA 59474
LEELAWOFFICEPC.COM

October 28, 2025

RECEIVED

OCT 30 2025

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

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

Attention: Ben Jones, Administrator/Petroleum Engineer

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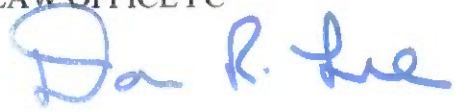
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Sincerely,

LEE LAW OFFICE PC

By: 
Don R. Lee

DRL/kly

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on October 28, 2025, I served a true and correct copy of the foregoing document to the following:

☒ U.S. Mail
☒ Facsimile
☐ FedEx
☒ E-mail

Heritage Energy Operating LLC
Attention: Josh Cornell, CEO
2448 E. 81st St., Suite 3600
Tulsa, OK 74137

By: _____

Karen L. Young, Paralegal

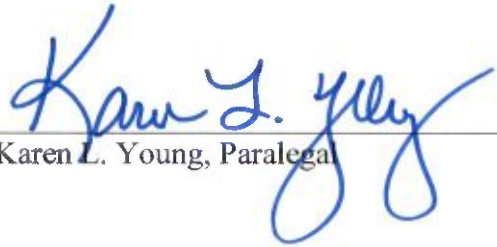


EXHIBIT "A"

Notice of Application

Published in Helena Independent Record on October 21, 2025

Location

Lewis and Clark County, Montana

Notice Text

Notice of Permit to Drill

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

In the Matter of the application of

State 15-10-3 4H

Heritage Energy Operating, LLC

for a Permit to Drill an oil and gas well.

NOTICE OF INTENTION TO APPLY

FOR PERMIT TO DRILL

OIL AND GAS WELL

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2448 E. 81st Street, Suite 3600

Tulsa, OK 74137

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Surface Location of Proposed Oil and Gas Well: (and projected bottom-
hole location, if a directional or horizontal well)

Richland County, MT

SHL: 664' F5L, 1,960' FEL, Sec. 15, T25N-R56E SWSE

BHL: 200' FNL, 660' FEL, Sec. 3, T25N-R56E NENE

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Montana Board of Oil and Gas Conservation

2535 St. Johns Avenue

Billings MT 59102

Office: (406) 656-0040

Fax: (406) 652-5305

October 21, 2025 COL-MT-201598 MNAXLP

374-2025

DEPARTMENT OF NATURAL RESOURCES
AND CONSERVATION
BOARD OF OIL AND GAS CONSERVATION



GREG GIANFORTE, GOVERNOR

OIL AND GAS CONSERVATION DIVISION

STATE OF MONTANA

November 3, 2025

Heritage Energy Operating LLC
2448 E. 81st Street Suite 2036
Tulsa, OK 74137

Re: Demand For Opportunity to Be Heard

Dear Heritage Energy Operating LLC:

This letter is regarding a demand for opportunity to be heard that was filed in accordance with ARM 36.22.601 concerning Heritage Energy Operating, LLC's (Heritage) published notifications of the State 15-10-3 2H, State 15-10-3 3H, State 15-10-3 4H, W. Poff Trust 14-11-2 1H, and the W. Poff Trust 14-11-2 2H well applications for permits to drill and the renewal of the application for permit to drill of the State 15-10-3 1H well that expired November 2, 2025.

The request for hearing was filed by Phoenix Operating LLC who is an interested person in the above-mentioned applications for permits to drill. In accordance with ARM 36.22.601, the applications for permits to drill will be referred to the Montana Board of Oil and Gas (Board) at its next regularly scheduled hearing on December 11, 2025. At that time, consideration of the applications for permits to drill will be reviewed by the Board.

If you have any questions, please contact me at (406) 656-0040 or at bjones@mt.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ben Jones".

Benjamin Jones
Administrator / Petroleum Engineer

cc: Josh Cornell: joshc@heritageenergyllc.com
Uriah Price: uprice@crowleyfleck.com
Don Lee: don@leelawofficepc.com
Mark Johnson: mjohnson@phxoperating.com

375-2025

DIVISION OFFICE
1539 11th AVENUE
PO BOX 201601
HELENA, MONTANA 59620-1601
(406) 444-6731

TECHNICAL AND
SOUTHERN FIELD OFFICE
2535 ST. JOHNS AVENUE
BILLINGS, MONTANA 59102-4693
(406) 656-0040

NORTHERN FIELD OFFICE
201 MAIN STREET
PO BOX 690
SHELBY, MONTANA 59474-0690
(406) 434-2422



DON R. LEE | BRIAN D. LEE | ATTORNEYS AT LAW
PHONE 406.434.5244 FAX 406.434.5246 P.O. BOX 790 | 158 MAIN STREET | SHELBY, MONTANA 59474
LEELAWOFFICEPC.COM

October 28, 2025

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OCT 30 2025

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

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

Attention: Ben Jones, Administrator/Petroleum Engineer

Re: Demand for Opportunity to be Heard

***Heritage Energy Operating, LLC Application for Permit
to Drill – W. Poff Trust 14-11-2 1H***

Dear Mr. Jones:

Pursuant to A.R.M. 36.22.601(6), Phoenix Operating LLC ("Phoenix"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, hereby demands a hearing before the Board of Oil and Gas Conservation of the State of Montana ("MBOGC") on the Heritage Energy Operating LLC ("Heritage") Application for Permit to Drill ("APD") a horizontal Bakken/Three Forks Formation well with a surface location within and upon the SW $\frac{1}{4}$ SE $\frac{1}{4}$ of Section 15, Township 25 North, Range 56 East, and a bottom hole location within and upon the NW $\frac{1}{4}$ NW $\frac{1}{4}$ of Section 2, Township 25 North, Range 56 East, being the W. Poff Trust 14-11-2 1H well ("Proposed Subject Well"). The referenced surface hole location and bottom location hole are in Richland County. The Proposed Subject Well is more specifically identified on Exhibit "A" attached to this correspondence and by reference incorporated herein.

Heritage has an existing permit in this drilling and spacing unit consisting of all of Sections 2, 11 and 14 in Township 25 North, Range 56 East by Commission Order No. 48-2025 ("DSU") being for the W. Poff Trust 14-11-2 4H well (API No. 25-083-23501-00-00). Heritage has not utilized this existing permit and upon information and belief has no intention of drilling its existing permit which expires December 19, 2025. Heritage should not be rewarded with more permits, when it hasn't utilized the permit it currently holds. In fact Heritage has permitted no less than 11 wells in the State of Montana with renewing 9 of those 11 permits, and to date has drilled zero wells, and

375-2025

has obtained no production. Upon information and belief, Heritage has no intention of nor definite plans to utilize the APD for the Proposed Subject Well, rather it intends to flip the acreage covered by the Proposed Subject Well by selling it to a to-be-determined buyer. As a result, the MBOGC has no way of assessing whether granting the APD will protect correlative rights or prevent waste because Heritage will not be utilizing the APD for anything but a sale to a third party.

In contrast, Phoenix has definite capital backed plans to drill four horizontal wells within the DSU in succession in 2026. Phoenix plans for full development, benefiting mineral owners by protecting correlative rights, preventing waste and benefiting the State of Montana by increasing severance taxes. Phoenix intends to drill four wells from this DSU alone, which benefits mineral owners, the State Montana and Phoenix, as well as other working interest owners. Phoenix's usual mode of operation is to drill as many wells as are allowable under spacing orders in succession in Montana and North Dakota. Phoenix will be filing its own APDs for the DSU before the MBOGC's December hearing and in time for the MBOGC to review Phoenix's plans in contrast to Heritage's plans. The Proposed Subject Well severely impacts the development plans of Phoenix, which plans are more beneficial to mineral owners and the State of Montana than Heritage's plans.

Phoenix believes that approving the Proposed Well APD of Heritage establishes bad precedent and negatively impacts the correlative rights of Phoenix and its oil and gas lessors and takes revenue away from the State of Montana.

I can be reached at (406) 450-2540 and Phoenix's representative, Mark Johnson, Vice President – Regulatory Affairs, can be reached at (303) 548-1953.

Sincerely,

LEE LAW OFFICE PC

By: 
Don R. Lee

DRL/kly

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OCT 30 2025

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

375-2025

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on October 28, 2025, I served a true and correct copy of the foregoing document to the following:

☒ U.S. Mail
☒ Facsimile
☐ FedEx
☒ E-mail

Heritage Energy Operating LLC
Attention: Josh Cornell, CEO
2448 E. 81st St., Suite 3600
Tulsa, OK 74137

By:


Karen L. Young, Paralegal

RECEIVED

OCT 30 2025

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

375 - 2025

EXHIBIT "A"

Notice of Application

Published in Helena Independent Record on October 21, 2025

Location

Levis and Clark County, Montana

Notice Text

Notice of Permit to Drill

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

In the Matter of the application of

W. Poff Trust 14-11-2 1H

Heritage Energy Operating, LLC

for a Permit to Drill an oil and gas well.

NOTICE OF INTENTION TO APPLY

FOR PERMIT TO DRILL

OIL AND GAS WELL

1. Name and address of Applicant:

Heritage Energy Operating, LLC

2448 E. 81st Street, Suite 3600

Tulsa, OK 74137

**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)**

Richland County, MT

SHL: 697' FSL, 1,960 FEL, Sec. 15, T25N-R56E SWSE

BHL: 200' FNL, 660' FWL, Sec. 2, T25N-R56E NWNW

3. Total Depth Proposed to be Drilled:

26,046' MD, 10,161' TVD

Notice is hereby given that an application for permit to drill an oil and
gas well at the surface location set forth above to the depth as stated
will be filed with the Montana Board of Oil and Gas Conservation.

Pursuant to Rules 36.22.601 and 36.22.604, Administrative Rules of
Montana, an interested party may demand an opportunity to be heard
by the Montana Board of Oil and Gas Conservation concerning the
application. SUCH DEMAND FOR HEARING MUST BE RECEIVED BY THE
MONTANA BOARD OF OIL AND GAS CONSERVATION AT THE ADDRESS
SET FORTH BELOW NO LATER THAN TEN (10) DAYS AFTER THE DATE
OF PUBLICATION OF THIS NOTICE. OR THE APPLICATION WILL BE
ACTED UPON BY THE BOARD'S PETROLEUM ENGINEER WITHOUT
HEARING. A DEMAND MUST: (1) SET FORTH THE NAME, ADDRESS
AND TELEPHONE NUMBER OF EACH INTERESTED PARTY, THEIR
OWNERSHIP INTEREST IN THE LANDS SURROUNDING THE PROPOSED
WELL AND THE REASONS WHY A HEARING IS SOUGHT; (2) BE SERVED
UPON THE APPLICANT BY COPY MAILED OR FAX TRANSMITTED TO
THE ADDRESS SET FORTH ABOVE; AND (3) A CERTIFICATE OF SERVICE
MUST ACCOMPANY THE DEMAND AS FILED WITH THE BOARD.

Montana Board of Oil and Gas Conservation

2535 St. Johns Avenue

Billings MT 59102

Office: (406) 656-0040

Fax: (406) 652-5305

October 21, 2025 COL-MT-201604 MNAXLP

4

375-2025



DON R. LEE | BRIAN D. LEE | ATTORNEYS AT LAW
PHONE 406.434.5244 FAX 406.434.5246 P.O. BOX 790 | 158 MAIN STREET | SHELBY, MONTANA 59474
LEELAWOFFICEPC.COM

October 28, 2025

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OCT 30 2025

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

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

Attention: Ben Jones, Administrator/Petroleum Engineer

Re: Demand for Opportunity to be Heard

***Heritage Energy Operating, LLC Application for Permit
to Drill – W. Poff Trust 14-11-2 2H***

Dear Mr. Jones:

Pursuant to A.R.M. 36.22.601(6), Phoenix Operating LLC ("Phoenix"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, hereby demands a hearing before the Board of Oil and Gas Conservation of the State of Montana ("MBOGC") on the Heritage Energy Operating LLC ("Heritage") Application for Permit to Drill ("APD") a horizontal Bakken/Three Forks Formation well with a surface location within and upon SW $\frac{1}{4}$ SE $\frac{1}{4}$ of Section 15, Township 25 North, Range 56 East, and a bottom hole location within and upon the NE $\frac{1}{4}$ NW $\frac{1}{4}$ of Section 2, Township 25 North, Range 56 East, being the W. Poff Trust 14-11-2 2H well ("Proposed Subject Well"). The referenced surface hole location and bottom hole location are in Richland County. The Proposed Subject Well is more specifically identified on Exhibit "A" attached to this correspondence and by reference incorporated herein.

Heritage has an existing permit in this drilling and spacing unit consisting of all of Sections 2, 11 and 14 in Township 25 North, Range 56 East by Commission Order No. 48-2025 ("DSU") being for the W. Poff Trust 14-11-2 4H well (API No. 25-083-23501-00-00). Heritage has not utilized this existing permit and upon information and belief has no intention of drilling its existing permit which expires December 19, 2025. Heritage should not be rewarded with more permits, when it hasn't utilized the permit it currently holds. In fact Heritage has permitted no less than 11 wells in the State of Montana with renewing 9 of those 11 permits, and to date has drilled zero wells, and

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In contrast, Phoenix has definite capital backed plans to drill four horizontal wells within the DSU in succession in 2026. Phoenix plans for full development, benefiting mineral owners by protecting correlative rights, preventing waste and benefiting the State of Montana by increasing severance taxes. Phoenix intends to drill four wells from this DSU alone, which benefits mineral owners, the State Montana and Phoenix, as well as other working interest owners. Phoenix's usual mode of operation is to drill as many wells as are allowable under spacing orders in succession in Montana and North Dakota. Phoenix will be filing its own APDs for the DSU before the MBOGC's December hearing and in time for the MBOGC to review Phoenix's plans in contrast to Heritage's. The Proposed Subject Well severely impacts the development plans of Phoenix, which plans are more beneficial to mineral owners and the State of Montana than Heritage's plans.

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Sincerely,

LEE LAW OFFICE PC

By: 
Don R. Lee

DRL/kly

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on October 28, 2025, I served a true and correct copy of the foregoing document to the following:

☒ U.S. Mail
☒ Facsimile
☐ FedEx
☒ E-mail

Heritage Energy Operating LLC
Attention: Josh Cornell, CEO
2448 E. 81st St., Suite 3600
Tulsa, OK 74137

By: _____


Karen L. Young, Paralegal

EXHIBIT "A"

Notice of Application

Published in Helena Independent Record on October 21, 2025

Location

Lewis and Clark County, Montana

Notice Text

Notice of Permit to Drill

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

In the Matter of the application of

W. Poff Trust 14-11-2 2H

Heritage Energy Operating, LLC

for a Permit to Drill an oil and gas well.

NOTICE OF INTENTION TO APPLY

FOR PERMIT TO DRILL

OIL AND GAS WELL

1. Name and address of Applicant:

Heritage Energy Operating, LLC

2448 E. 81st Street, Suite 3600

Tulsa, OK 74137

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)

Richland County, MT

SHL: 730' FSL, 1,960' FEL, Sec. 15, T25N-R56E SWSE

BHL: 200' FNL, 1,980' FWL, Sec. 2, T25N-R56E NENW

3. Total Depth Proposed to be Drilled:

26,633' MD, 10,161' TVD

Notice is hereby given that an application for permit to drill an oil and
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Montana Board of Oil and Gas Conservation

2535 St. Johns Avenue

Billings MT 59102

Office: (406) 656-0040

Fax: (406) 652-5305

October 21, 2025 COL-MT-201603 MNAXLP

375-2025



ATTORNEYS AT LAW
DON R. LEE | BRIAN D. LEE | CAYDON C. KELLER
PHONE 406.434.5244 FAX 406.434.5246 P.O. BOX 790 | 158 MAIN STREET | SHELBY, MONTANA 59474
LEELAWOFFICEPC.COM

November 4, 2025

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

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NOV 07 2025

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

Attention: Ben Jones, Administrator/Petroleum Engineer

Re: Demand for Opportunity to be Heard

***Heritage Energy Operating, LLC Application for Permit
to Drill – W. Poff Trust 14-11-2 3H***

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Heritage has an existing permit in this drilling and spacing unit consisting of all of Sections 2, 11 and 14 in Township 25 North, Range 56 East by Commission Order No. 48-2025 ("DSU") being the for the W. Poff Trust 14-11-2 4H well (API No. 25-083-23501-00-00). Heritage has not utilized this existing permit and upon information and belief has no intention of drilling its existing permit which expires December 19, 2025. Heritage should not be rewarded with more permits, when it has not utilized the permit it currently holds. In fact Heritage has permitted no less than 11 wells in the State of Montana with renewing 9 of those 11 permits, and to date has drilled zero

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LEE LAW OFFICE PC

By: 
Don R. Lee

DRL/kly

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

375-2025

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on November 4, 2025, I served a true and correct copy of the foregoing document to the following:

[X] U.S. Mail
[X] Facsimile
[] FedEx
[X] E-mail

Heritage Energy Operating LLC
Attention: Josh Cornell, CEO
2448 E. 81st St., Suite 3600
Tulsa, OK 74137

By:


Karen L. Young, Paralegal

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

375-2025



November 4, 2025

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MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

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

Attention: Ben Jones, Administrator/Petroleum Engineer

**Re: *Permit Protest re In the Matter of W. Poff Trust 14-11-2 4H,
Heritage Energy Operating LLC, for a Renewal of Permit to
Drill an Oil and Gas Well***

Dear Mr. Jones:

Phoenix Operating LLC ("Phoenix"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, hereby protests and requests a hearing on the Application of Heritage Energy Operating LLC ("Heritage") for a renewal of the permit to drill the W. Poff Trust 14-11-2 4H in all of Sections 2, 11, and 14, Township 25 North, Range 56 East, Richland County, Montana on the following grounds:

1. Phoenix owns an estimated 62.33% working interest in Sections 1, 12 and 13, 51.03% working interest in Sections 3, 10 and 15, and 25.73% working interest in Sections 2, 11 and 14, all in Township 25 North, Range 56 East, Richland County, Montana.
2. Phoenix protests on the basis that awarding a permit to drill to Heritage for a spacing unit comprised of all of Sections 2, 11, and 14 T25N, R56E (Order 48-2025) does not promote the most orderly and efficient development of the oil and gas resource and may result in economic and physical waste as well as a violation of correlative rights to the owners of the surrounding area.
3. Phoenix plans to drill four wells in a spacing unit comprised of all of Sections 1, 12, and 13, T25N, R56E, four wells in a spacing unit comprised of all of Sections 2, 11, and 14 T25N, R56E, and four wells in a spacing unit comprised of all of Sections 3, 10 and 15, T25N, R56E, all in the year 2026. Phoenix's

development plan results in production from twelve wells for owners in nine sections. While Heritage has submitted three separate permits for these spacing units, all have either expired (State 15-10-3 1H on November 2, 2025), or are set to expire by December 19, 2025 (W. Poff Trust 14-11-2 4H) and January 24, 2026 (E. Poff Trust 13-12-1 1H), and Heritage has drilled none, and upon information and belief Heritage will drill none.

4. Heritage has recently submitted additional permits to drill additional wells within these spacing units, even though it has not utilized its expired or expiring permits. Allowing Heritage to proceed with the proposed permits encumbers nine sections with permits that may never be utilized, or underutilized by unknown third parties by, for example, drilling only one well within each spacing unit, and waiting for an indefinite future time while additional permits are applied for renewal, or not utilized.
5. Heritage has permitted no less than 11 wells in the State of Montana with renewing 9 of those 11 permits, and to date has drilled zero wells, and has obtained no production.
6. In contrast, Phoenix plans for full development, benefiting mineral owners by protecting correlative rights, preventing waste and benefiting the State of Montana by increasing severance taxes. Phoenix intends to drill four wells from this spacing unit alone, which benefits mineral owners, the State Montana and Phoenix, as well as other working interest owners. Phoenix's usual mode of operation is to drill as many wells as are allowable under spacing orders in succession in Montana and North Dakota.
7. The W. Poff Trust 14-11-2 4H permit has been active since June 19, 2025. Heritage has had time to drill the W. Poff Trust 14-11-2 4H well. Heritage's failure to develop under the W. Poff Trust 14-11-2 4H while requesting a renewal of this permit and submission of additional permits while failing to drill is a deterrent to development, makes development more expensive by driving up the costs of development by a third party, and does not promote the conservation of oil and gas, the prevention of waste, or the protection of correlative rights.
8. Upon information and belief, it is Phoenix's understanding that Heritage has no intention of drilling and operating the W. Poff Trust 14-11-2 4H well; rather to obtain an acreage position through the permitting process and to flip the acreage to a third party.
9. Phoenix will be filing its own APDs for the spacing units referenced above before the Board's December hearing and in time for the Board to review Phoenix's plans in contrast to Heritage's.

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Page 2 of 4

10. Phoenix notes that recent temporary spacing orders issued by the Montana Board of Oil & Gas Conservation Commission ("MBOGC") require commencement of operations within one year of the issuance of said order. Thus, it is evident that the MBOGC shares Phoenix's concern that stagnant permits and temporary spacing orders can indirectly condemn lands otherwise available for development.
11. Should Heritage's permit renewal be approved, Phoenix, the majority working interest owner in two of the three spacing units, would delay development in Sections 1, 12, and 13, in Sections 2, 11, and in Sections 3, 10 and 15, all in T25N, R56E. Thus, Heritage's permit to flip plans affects owners across nine sections.

I can be reached at (406) 450-2540 and Phoenix's representative, Mark Johnson, Vice President – Regulatory Affairs, can be reached at (303) 548-1953.

Sincerely,

LEE LAW OFFICE PC

By: 

Don R. Lee

DRL/kly

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

CERTIFICATE OF SERVICE

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[X] U.S. Mail
[X] Facsimile
[] FedEx
[X] E-mail

Heritage Energy Operating LLC
Attention: Josh Cornell, CEO
2448 E. 81st St., Suite 3600
Tulsa, OK 74137

By:


Karch L. Young, Paralegal

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NOV 07 2025

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

375-2025

BEFORE THE BUREAU OF LAND MANAGEMENT, MONTANA STATE OFFICE
UNITED STATES DEPARTMENT OF THE INTERIOR

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

IN THE MATTER OF THE APPLICATION OF OASIS PETROLEUM NORTH AMERICA LLC FOR AN ORDER CREATING A PERMANENT SPACING UNIT ("PSU") COMPRISED OF ALL OF SECTIONS 1, 2, 11, 12, 13, 14, 23 AND 24, TOWNSHIP 27 NORTH, RANGE 59 EAST, M.P.M., ROOSEVELT COUNTY, MONTANA, FOR THE PRODUCTION OF OIL AND ASSOCIATED NATURAL GAS FROM THE BAKKEN/THREE FORKS FORMATION FROM APPLICANT'S STATE LINE FEDERAL 2759 14-26 2B WELL, AND ANY OTHER RELIEF THAT THE MBOGC OR BLM MAY DEEM APPROPRIATE.

BLM DOCKET NO. 5-2026

MBOGC DOCKET NO. 376-2025

APPLICATION

OASIS PETROLEUM NORTH AMERICA LLC, 1001 FANNIN STREET, STE 1500, HOUSTON, TX 77002

[A] Presents the following application:

1. Applicant is an interest owner and operator within the above-described lands, and its State Line Federal 2759 14-26 2B well has been successfully completed as a commercial producer of oil and associated natural gas from the Bakken/Three Forks formation thereunder.
2. To efficiently and economically develop the reservoir, and to protect correlative rights of all owners in the captioned lands, all of Sections 1, 2, 11, 12, 13, 14, 23 and 24, Township 27 North, Range 59 East, M.P.M., Roosevelt County, Montana, should be designated a PSU for the production of oil and associated natural gas from the Bakken/Three Forks formation from Applicant's State Line Federal 2759 14-26 2B well.
3. The SW¼ of Section 11 and the W½SW¼ of Section 24, Township 27 North, Range 59 East, M.P.M., include Indian lands, and accordingly, the MOU between the United States BLM and the MBOGC is applicable.

[B] Requests:

1. This matter be set for hearing, with notice given as required by law and the MOU;
2. After hearing the matter, the Board enter an order (i) designating all of Sections 1, 2, 11, 12, 13, 14, 23 and 24, Township 27 North, Range 59 East, M.P.M., Roosevelt County, Montana, a PSU for the production of oil and associated natural gas from the Bakken/Three Forks formation from Applicant's State Line Federal 2759 14-26 2B well; and (ii) any other relief as the Board may deem appropriate; and
3. After hearing the matter, the BLM enter an order (i) designating all of Sections 1, 2, 11, 12, 13, 14, 23 and 24, Township 27 North, Range 59 East, M.P.M., Roosevelt County, Montana, a PSU for the production of oil and associated natural gas from the Bakken/Three Forks formation from Applicant's State Line Federal 2759 14-26 2B well; and (ii) any other relief as the BLM may deem appropriate.


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NOV 03 2025

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

Dated this 30th day of October, 2025.

OASIS PETROLEUM NORTH AMERICA LLC

By  _____
Uriah J. Price, Its Attorney
Crowley Fleck, PLLP
P. O. Box 10969
Bozeman, MT 59719
uprice@crowleyfleck.com

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MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

**BEFORE THE BUREAU OF LAND MANAGEMENT, MONTANA STATE OFFICE
UNITED STATES DEPARTMENT OF THE INTERIOR**

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

IN THE MATTER OF THE APPLICATION OF OASIS PETROLEUM NORTH AMERICA LLC FOR AN ORDER POOLING ALL INTERESTS IN THE PERMANENT SPACING UNIT ("PSU") COMPRISED OF ALL OF SECTIONS 1, 2, 11, 12, 13, 14, 23 AND 24, TOWNSHIP 27 NORTH, RANGE 59 EAST, M.P.M., ROOSEVELT COUNTY, MONTANA, FOR THE PRODUCTION OF OIL AND ASSOCIATED NATURAL GAS FROM THE BAKKEN/THREE FORKS FORMATION FROM APPLICANT'S STATE LINE FEDERAL 2759 14-26 2B WELL, REQUEST FOR NON-CONSENT PENALTIES AND ANY OTHER RELIEF THAT THE MBOGC OR BLM MAY DEEM APPROPRIATE.

BLM DOCKET NO. 6-2026

MBOGC DOCKET NO. 377-2025

APPLICATION

OASIS PETROLEUM NORTH AMERICA LLC, 1001 FANNIN STREET, STE 1500, HOUSTON, TX 77002

[A] Presents the following application:

1. Applicant is an interest owner and operator within the above-described lands, and its State Line Federal 2759 14-26 2B well has been successfully completed as a commercial producer of oil and associated natural gas from the Bakken/Three Forks formation thereunder.

2. It is anticipated that the captioned lands will comprise a PSU for purposes of Bakken/Three Forks formation production, as to Applicant's State Line Federal 2759 14-26 2B well, pursuant to Montana Board of Oil and Gas Conservation Order No. ____-2025 and BLM Order No. ____-2025.

3. As of the date of this application, Applicant has been unable to establish voluntary pooling of all interests within the PSU with respect to the State Line Federal 2759 14-26 2B well, and it is anticipated that such pooling cannot be consummated prior to the hearing on this application.

4. In the absence of voluntary pooling all interests within the proposed PSU, the pooling of all interests in the spacing unit for the development and operation thereof should be effectuated by an order of the Board for that purpose.

5. The SW¼ of Section 11 and the W½SW¼ of Section 24, Township 27 North, Range 59 East, M.P.M., include Indian lands, and accordingly, the MOU between the United States BLM and the MBOGC is applicable.

[B] Requests:

1. This matter be set for hearing, with notice given as required by law and the MOU;

2. After hearing the matter, the Board enter its order (i) pooling all interests in the PSU comprised of all of Sections 1, 2, 11, 12, 13, 14, 23 and 24, Township 27 North, Range 59 East, M.P.M., Roosevelt County, Montana, for the production of oil and associated natural gas from the Bakken/Three Forks formation from Applicant's State Line Federal 2759 14-26 2B well, and authorizing the recovery of non-consent penalties in

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accordance with Section 82-11-202(2), M.C.A., with respect to the State Line Federal 2759 14-26 2B well; and (ii) any other relief as the Board may deem appropriate; and

3. After hearing the matter, the BLM enter an order (i) pooling all interests in the PSU comprised of all of Sections 1, 2, 11, 12, 13, 14, 23 and 24, Township 27 North, Range 59 East, M.P.M., Roosevelt County, Montana, for the production of oil and associated natural gas from the Bakken/Three Forks formation from Applicant's State Line Federal 2759 14-26 2B well; and (ii) any other relief as the BLM may deem appropriate.

Dated this 30th day of October, 2025.

OASIS PETROLEUM NORTH AMERICA LLC

By



Uriah J. Price, Its Attorney
Crowley Fleck, PLLP
P. O. Box 10969
Bozeman, MT 59719
uprice@crowleyfleck.com

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MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

**BEFORE THE BUREAU OF LAND MANAGEMENT, MONTANA STATE OFFICE
UNITED STATES DEPARTMENT OF THE INTERIOR**

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

IN THE MATTER OF THE APPLICATION OF OASIS PETROLEUM NORTH AMERICA LLC FOR AN ORDER AUTHORIZING ONE (1) ADDITIONAL HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL IN THE PERMANENT SPACING UNIT ("PSU") COMPRISED OF ALL OF SECTIONS 1, 2, 11, 12, 13, 14, 23 AND 24, TOWNSHIP 27 NORTH, RANGE 59 EAST, M.P.M., ROOSEVELT COUNTY, MONTANA, AT ANY LOCATION NOT CLOSER THAN 200' (HEEL TOE SETBACK) / 500' (LATERAL SETBACK) TO THE BOUNDARIES OF THE PSU, AND ANY OTHER RELIEF THAT THE MBOGC OR BLM MAY DEEM APPROPRIATE.

BLM DOCKET NO. 7-2026

MBOGC DOCKET NO. 378-2025

APPLICATION

OASIS PETROLEUM NORTH AMERICA LLC, 1001 FANNIN STREET, STE 1500, HOUSTON, TX 77002

[A] Presents the following application:

1. Applicant is an interest owner within all or portions of Sections 1, 2, 11, 12, 13, 14, 23 and 24, Township 27 North, Range 59 East, M.P.M., Roosevelt County, Montana. It is anticipated that such lands will comprise a permanent spacing unit ("PSU") for purposes of Bakken/Three Forks formation production pursuant to Montana Board of Oil and Gas Conservation Order No. ____-2025 & BLM Order No. ____-2025 FED.

2. Applicant requests authority to drill up to one (1) additional horizontal Bakken/Three Forks formation well within the PSU, at any location not closer than 200' (heel toe setback) / 500' (lateral setback) to the exterior boundaries thereof, if in its judgment as operator of the PSU such operations appear reasonable and prudent.

3. The SW¼ of Section 11 and the W½SW¼ of Section 24, Township 27 North, Range 59 East, M.P.M., include Indian lands, and accordingly, the MOU between the United States BLM and the MBOGC is applicable.

[B] Requests:

1. This matter be set for hearing, with notice given as required by law and the MOU;

2. After hearing the matter, the Board enter an order (i) authorizing the Applicant to drill up to one (1) additional horizontal Bakken/Three Forks formation well at any location within, but not closer than 200' (heel toe setback) / 500' (lateral setback) to the exterior boundaries of, the PSU comprised of all of Sections 1, 2, 11, 12, 13, 14, 23 and 24, Township 27 North, Range 59 East, M.P.M., Roosevelt County, Montana; and (ii) any other relief as the MBOGC may deem appropriate; and

3. After hearing the matter, the BLM enter an order (i) authorizing the Applicant to drill up to one (1) additional horizontal Bakken/Three Forks formation well at any location within, but not closer than 200' (heel toe setback) / 500' (lateral setback) to the exterior boundaries of, the PSU comprised of all of Sections 1, 2, 11, 12, 13, 14, 23 and 24, Township 27 North, Range 59 East, M.P.M., Roosevelt County, Montana; and (ii) any other relief as the BLM may deem appropriate


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

Dated this 30th day of October, 2025.

OASIS PETROLEUM NORTH AMERICA LLC

By 
Uriah J. Price, Its Attorney
Crowley Fleck, PLLP
P. O. Box 10969
Bozeman, MT 59719
uprice@crowleyfleck.com

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MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

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

IN THE MATTER OF THE APPLICATION OF OASIS PETROLEUM NORTH AMERICA LLC FOR AN ORDER CREATING AN OVERLAPPING TEMPORARY SPACING UNIT ("OTSU") COMPRISED OF ALL OF SECTIONS 3, 10, 15 AND 22, TOWNSHIP 27 NORTH, RANGE 59 EAST, M.P.M., ROOSEVELT COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT ANY LOCATION NOT CLOSER THAN 200' (HEEL TOE SETBACK) / 500' (LATERAL SETBACK) TO THE BOUNDARIES OF THE OTSU, CLARIFYING BOARD ORDER NOS., 237-2011, 29-2012 & 345-2014, VACATING ORDER NOS. 75-2009, 177-2012, 280-2012, 112-2014, 65-2013 & 116-2014, AND ANY OTHER RELIEF THAT THE MBOGC MAY DEEM APPROPRIATE.

MBOGC DOCKET NO. 379-2025

APPLICATION

OASIS PETROLEUM NORTH AMERICA LLC, 1001 FANNIN STREET, STE 1500, HOUSTON, TX 77002

[A] Presents the following application:

1. Applicant is an interest owner within all or portions of Sections 3, 10, 15 and 22, Township 27 North, Range 59 East, M.P.M., Roosevelt County, Montana, and operates all of the existing wells within such lands. Sections 3 & 10 are presently subject to Board Order Nos. 237-2011 (PSU), 177-2012 (inc. density), 280-2012 (inc. density) and 112-2014 (amend. inc. density), and Oasis Petroleum North America LLC operates the Mary Wilson 10-3H well located in the permanent spacing unit comprised of all of Sections 3 & 10, Township 27 North, Range 59 East. Sections 15 & 22 are presently subject to Board Order Nos. 29-2012 (PSU), 65-2013 (inc. density) and 116-2014 (amend. inc. density), and Oasis Petroleum North America LLC operates the Brewer 2759 13-15H well located in the permanent spacing unit comprised of all of Sections 15 & 22, Township 27 North, Range 59 East. Additionally, Sections 15 and 22 (along with Sections 16 and 21) are subject to Board Order Nos. 344-2014 (PSU) and 345-2014 (pooling), and Oasis Petroleum North America LLC operates the Falcon Fed. Brewer 2759 44-9 5B well located in the permanent spacing unit comprised of all of Sections 15, 16, 21 & 22, Township 27 North, Range 59 East. Finally, Section 15 is subject to Board Order No. 75-2009 (PSU), and Oasis Petroleum North America LLC operated the Wilson 4-15H well located in the permanent spacing unit comprised of all of Section 15, Township 27 North, Range 59 East. The Wilson 4-15H well last produced in 2015 and was plugged in 2024.

2. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill a horizontal Bakken/Three Forks formation well at a location within, but not closer than 200' (heel toe setback) / 500' (lateral setback) to the exterior boundaries of, an OTSU comprised of all of Sections 3, 10, 15 and 22, Township 27 North, Range 59 East, M.P.M. To preserve correlative rights of all interest owners in Sections 3 & 10, Board Order No. 237-2011 should be amended to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the Mary Wilson 10-3H well. To preserve correlative rights of all interest owners in Sections 15 & 22, Board Order No. 29-2012 should be amended to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the Brewer 2759 13-15H well. Further, to preserve correlative rights of all interest owners in Sections 15 and 22, along with Sections 16 and 21, Board Order No. 345-2014 should be amended to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the Falcon Fed. Brewer 2759 44-9 5B well. It will also be necessary to vacate Board Order No. 75-2009 (640-

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GAS CONSERVATION • BILLINGS

acre PSU for Section 15) and increased density Board Order Nos. 177-2012, 280-2012, 112-2014 (for Sections 3 & 10) & 65-2013 and 116-2014 (for Sections 15 & 22).

3. Applicant will, within 90 days of successful completion of the proposed horizontal operation, file an application for the Board's consideration of permanent spacing and other matters relating to production from the well.

[B] Requests:

1. This matter be set for hearing, with notice given as required by law and the MOU;

2. After hearing the matter, the Board enter its order (i) creating an OTSU comprised of ALL of Sections 3, 10, 15 and 22, Township 27 North, Range 59 East, M.P.M., Roosevelt County, Montana, and authorizing the drilling of a horizontal Bakken/Three Forks formation well at any location within such OTSU but not closer than 200' (heel toe setback) / 500' (lateral setback) to the exterior boundaries thereof; (ii) amending Board Order 237-2011 to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the Mary Wilson 10-3H well; (iii) amending Board Order 29-2012 to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the Brewer 2759 13-15H well; (iv) amending Board Order 345-2014 to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the Falcon Fed. Brewer 2759 44-9 5B well; (v) vacating Board Order Nos. 75-2009, 177-2012, 280-2012, 112-2014, 65-2013 and 116-2014; and (vi) any other relief as the Board may deem appropriate.

Dated this 30th day of October, 2025.

OASIS PETROLEUM NORTH AMERICA LLC

By



Uriah J. Price, Its Attorney
Crowley Fleck, PLLP
P. O. Box 10969
Bozeman, MT 59719
uprice@crowleyfleck.com

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

IN THE MATTER OF THE APPLICATION OF OASIS PETROLEUM NORTH AMERICA LLC FOR AN ORDER AUTHORIZING THE DRILLING OF UP TO TWO (2) ADDITIONAL HORIZONTAL BAKKEN/THREE FORKS FORMATION WELLS IN THE OVERLAPPING TEMPORARY SPACING UNIT ("OTSU") COMPRISED OF ALL OF SECTIONS 3, 10, 15 AND 22, TOWNSHIP 27 NORTH, RANGE 59 EAST, M.P.M., ROOSEVELT COUNTY, MONTANA, AT ANY LOCATION NOT CLOSER THAN 200' (HEEL TOE SETBACK) / 500' (LATERAL SETBACK) TO THE BOUNDARIES OF THE OTSU, AND ANY OTHER RELIEF THAT THE MBOGC MAY DEEM APPROPRIATE.

MBOGC DOCKET NO. 380-2025
APPLICATION

OASIS PETROLEUM NORTH AMERICA LLC, 1001 FANNIN STREET, STE 1500, HOUSTON, TX 77002

[A] Presents the following application:

1. Applicant is an interest owner and operator within all or portions of Sections 3, 10, 15 and 22, Township 27 North, Range 59 East, M.P.M., Roosevelt County, Montana. It is anticipated that such lands will comprise an overlapping temporary spacing unit ("OTSU") for purposes of Bakken/Three Forks formation production pursuant to Montana Board of Oil and Gas Conservation Order No. ____-2025.

2. Applicant requests authority to drill up to two (2) additional horizontal Bakken/Three Forks formation wells within the OTSU, at any location not closer than 200' (heel toe setback) / 500' (lateral setback) to the exterior boundaries thereof, if in its judgment as operator of the OTSU such operations appear reasonable and prudent.

[B] Requests:

1. This matter be set for hearing, with notice given as required by law and the MOU;

2. After hearing the matter, the Board enter its order (i) authorizing the Applicant to drill up to two (2) additional horizontal Bakken/Three Forks formation wells at any location within, but not closer than 200' (heel toe setback) / 500' (lateral setback) to the exterior boundaries of, the OTSU comprised of all of Sections 3, 10, 15 and 22, Township 27 North, Range 59 East, M.P.M., Roosevelt County, Montana, and (ii) any other relief as the Board may deem appropriate.

Dated this 30th day of October, 2025.

OASIS PETROLEUM NORTH AMERICA LLC

By _____



Uriah J. Price, Its Attorney
Crowley Fleck, PLLP
P. O. Box 10969
Bozeman, MT 59719
uprice@crowleyfleck.com

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MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

**BEFORE THE BUREAU OF LAND MANAGEMENT, MONTANA STATE OFFICE
UNITED STATES DEPARTMENT OF THE INTERIOR**

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

IN THE MATTER OF THE APPLICATION OF OASIS PETROLEUM NORTH AMERICA LLC FOR AN ORDER CREATING AN OVERLAPPING TEMPORARY SPACING UNIT ("OTSU") COMPRISED OF ALL OF SECTIONS 1, 2, 3, 10, 11, 12, 13, 14, 15, 22, 23 AND 24, TOWNSHIP 27 NORTH, RANGE 59 EAST, M.P.M., ROOSEVELT COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT A LOCATION PROXIMATE TO THE COMMON BOUNDARY BETWEEN THE PERMANENT SPACING UNIT (PSU) COMPRISED OF SECTIONS 1, 2, 11, 12, 13, 14, 23 AND 24 & THE OTSU COMPRISED OF SECTIONS 3, 10, 15 AND 22, TOWNSHIP 27 NORTH, RANGE 59 EAST, VACATING BOARD ORDER NO. 124-2014 AND BLM ORDER NO. 7-2014 FED, AND ANY OTHER RELIEF THAT THE BOARD or BLM MAY DEEM APPROPRIATE.

BLM DOCKET NO. 8-2026

MBOGC DOCKET NO. 391-2025

APPLICATION

OASIS PETROLEUM NORTH AMERICA LLC, 1001 FANNIN STREET, STE 1500, HOUSTON, TX 77002

[A] Presents the following application:

1. Applicant is an interest owner within all or portions of the captioned lands. It is anticipated Sections 1, 2, 11, 12, 13, 14, 23 and 24, Township 27 North, Range 59 East, M.P.M., Roosevelt County, Montana, will comprise a permanent spacing unit for purposes of Bakken/Three Forks formation production pursuant to Board Order ____-2025 and BLM Order ____-2025 FED. It is anticipated that Sections 3, 10, 15 and 22, Township 27 North, Range 59 East, M.P.M., Roosevelt County, Montana, will comprise an overlapping temporary spacing unit for purposes of Bakken/Three Forks formation production pursuant to Board Order ____-2025.

2. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill a horizontal Bakken/Three Forks formation well in an OTSU comprised of all of Sections 1, 2, 3, 10, 11, 12, 13, 14, 15, 22, 23 and 24, Township 27 North, Range 59 East, M.P.M., Roosevelt County, Montana. The well will be drilled at a location proximate to the common boundary between Sections 2, 11, 14 and 23 & Sections 3, 10, 15 and 22, with a heel/toe setback of 200'. It will be necessary to vacate Board Order No. 124-2014 and BLM Order No. 7-2014 FED, which formed an undeveloped overlapping temporary spacing unit comprised of Sections 1, 2, 3, 10, 11 and 12, Township 27 North, Range 59 East, to drill a horizontal Bakken/Three Forks formation section line well between Sections 2, 11 and 14 & Sections 3, 10 and 15.

3. The SW¼ of Section 11 and the W½SW¼ of Section 24, Township 27 North, Range 59 East, M.P.M., include Indian lands, and accordingly, the MOU between the United States BLM and the MBOGC is applicable.

4. Applicant will, within 90 days of successful completion of the proposed horizontal operation, file an application for the Board's consideration of permanent spacing and other matters relating to production from the well.

[B] Requests:

1. This matter be set for hearing, with notice given as required by law and the MOU;

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2. After hearing the matter, the Board enter an order (i) creating an OTSU comprised of ALL of Sections 1, 2, 3, 10, 11, 12, 13, 14, 15, 22, 23 and 24, Township 27 North, Range 59 East, M.P.M., Roosevelt County, Montana, for purposes of drilling a horizontal Bakken/Three Forks formation well at a location proximate to the common boundary between Sections 2, 11, 14 and 23 & Sections 3, 10, 15 and 22, with a heel/toe setback of 200', and providing that the OTSU shall be limited to production from the proposed horizontal well with no allocation to portions of any existing spacing unit located outside of the OTSU boundaries; (ii) vacating Board Order No. 124-2014, and (iii) any other relief that the Board deems appropriate; and

3. After hearing the matter, the BLM enter an order (i) creating an OTSU comprised of ALL of Sections 1, 2, 3, 10, 11, 12, 13, 14, 15, 22, 23 and 24, Township 27 North, Range 59 East, M.P.M., Roosevelt County, Montana, for purposes of drilling a horizontal Bakken/Three Forks formation well at a location proximate to the common boundary between Sections 2, 11, 14 and 23 & Sections 3, 10, 15 and 22, with a heel/toe setback of 200', and providing that the OTSU shall be limited to production from the proposed horizontal well with no allocation to portions of any existing spacing unit located outside of the OTSU boundaries; (ii) vacating BLM Order No. 7-2014 FED, and (iii) any other relief that the BLM deems appropriate.

Dated this 30th day of October, 2025.

OASIS PETROLEUM NORTH AMERICA LLC

By 
Uriah J. Price, Its Attorney
Crowley Fleck, PLLP
P. O. Box 10969
Bozeman, MT 59719
uprice@crowleyfleck.com

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MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

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

IN THE MATTER OF THE APPLICATION OF HERITAGE ENERGY OPERATING, LLC FOR AN ORDER CREATING A TEMPORARY SPACING UNIT ("TSU") COMPRISED OF ALL OF SECTIONS 5 & 8, TOWNSHIP 25 NORTH, RANGE 56 EAST, AND ALL OF SECTIONS 29 & 32, TOWNSHIP 26 NORTH, RANGE 56 EAST, M.P.M., RICHLAND COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT ANY LOCATION NOT CLOSER THAN 200' (HEEL TOE SETBACK) / 500' (LATERAL SETBACK) TO THE BOUNDARIES OF THE TSU, VACATING BOARD ORDER NO. 359-2011, AND SUCH OTHER AND FURTHER RELIEF AS THE BOARD MAY DEEM APPROPRIATE.

MBOGC DOCKET NO. 382-2025

APPLICATION

HERITAGE ENERGY OPERATING, LLC, 2448 E. 81st Street, Suite 3600, Tulsa, OK 74137:

[A] Presents the following application:

1. Applicant is an interest owner within all or portions of Sections 5 & 8, Township 25 North, Range 56 East, and Sections 29 & 32, Township 26 North, Range 56 East, M.P.M., Richland County, Montana. Sections 5 & 8, Township 25 North, Range 56 East, comprise an undeveloped 1280-acre temporary spacing unit formed by Board Order 359-2011. Sections 29 & 32, Township 26 North, Range 56 East, are subject to Board Order 380-2011.

2. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill a horizontal Bakken/Three Forks formation well at a location within, but not closer than 200' (heel toe setback) / 500' (lateral setback) to the exterior boundaries of, a TSU comprised of all of Sections 5 & 8, Township 25 North, Range 56 East, and Sections 29 & 32, Township 26 North, Range 56 East, M.P.M., Richland County, Montana. It will be necessary to vacate Board Order No. 359-2011 which formed the undeveloped temporary spacing unit comprised of Sections 5 & 8, Township 25 North, Range 56 East.

3. The NE $\frac{1}{4}$ SW $\frac{1}{4}$ of Section 32, Township 26 North, Range 56 East, M.P.M., include federal minerals and, therefore, the MOU between the United States BLM and the Board is applicable.

4. Applicant will, within 90 days of successful completion of the proposed horizontal operation, file an application for the Board's consideration of permanent spacing and other matters relating to production from said well.

[B] Requests:

1. This matter be set for hearing, with notice given as required by law and the MOU;

2. After hearing the matter, the Board enter its order (i) creating a TSU comprised of all of Sections 5 & 8, Township 25 North, Range 56 East, and Sections 29 & 32, Township 26 North, Range 56 East, M.P.M., Richland County, Montana, and authorizing the drilling of a horizontal Bakken/Three Forks formation well at any location within such TSU but not closer than 200' (heel-toe setback) / 500' (lateral setback) to the exterior


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boundaries thereof, (ii) vacating Board Order No. 359-2011; and (iii) such other and further relief as the Board may deem appropriate.

Dated this 30th day of October, 2025.

HERITAGE ENERGY OPERATING, LLC

By  _____
Uriah J. Price, Its Attorney
Crowley Fleck, PLLP
P. O. Box 10969
Bozeman, MT 59719
uprice@crowleyfleck.com

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MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

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

IN THE MATTER OF THE APPLICATION OF HERITAGE ENERGY OPERATING, LLC FOR AN ORDER AUTHORIZING THE DRILLING OF UP TO THREE (3) ADDITIONAL HORIZONTAL BAKKEN/THREE FORKS FORMATION WELLS IN THE TEMPORARY SPACING UNIT ("TSU") COMPRISED OF ALL OF SECTIONS 5 & 8, TOWNSHIP 25 NORTH, RANGE 56 EAST, AND ALL OF SECTIONS 29 & 32, TOWNSHIP 26 NORTH, RANGE 56 EAST, M.P.M., RICHLAND COUNTY, MONTANA, AT ANY LOCATION NOT CLOSER THAN 200' (HEEL TOE SETBACK) / 500' (LATERAL SETBACK) TO THE BOUNDARIES OF THE TSU, AND SUCH OTHER AND FURTHER RELIEF AS THE BOARD MAY DEEM APPROPRIATE.

MBOGC DOCKET NO. 383-2025

APPLICATION

HERITAGE ENERGY OPERATING, LLC, 2448 E. 81st Street, Suite 3600, Tulsa, OK 74137:

[A] Presents the following application:

1. Applicant is an interest owner within all or portions of Sections 5 & 8, Township 25 North, Range 56 East, and Sections 29 & 32, Township 26 North, Range 56 East, M.P.M., Richland County, Montana. It is anticipated that such lands will comprise a temporary spacing unit ("TSU") for purposes of Bakken/Three Forks formation production pursuant to Montana Board of Oil and Gas Conservation Order No. ____-2025.

2. Applicant requests authority to drill up to three (3) additional horizontal Bakken/Three Forks formation wells within the TSU, at any location not closer than 200' (heel toe setback) / 500' (lateral setback) to the exterior boundaries thereof, if in its judgment as operator of the TSU such operations appear reasonable and prudent.

3. The NE $\frac{1}{4}$ SW $\frac{1}{4}$ of Section 32, Township 26 North, Range 56 East, M.P.M., include federal minerals and, therefore, the MOU between the United States BLM and the Board is applicable.


[B] Requests:

1. This matter be set for hearing, with notice given as required by law and the MOU;

2. After hearing the matter, the Board enter its order authorizing the Applicant to drill up to three (3) additional horizontal Bakken/Three Forks formation wells at any location within, but not closer than 200' (heel toe setback) / 500' (lateral setback) to the exterior boundaries of, the TSU comprised of all of Sections 5 & 8, Township 25 North, Range 56 East, and Sections 29 & 32, Township 26 North, Range 56 East, M.P.M., Richland County, Montana, and such other and further relief as the Board may deem appropriate.

Dated this 30th day of October, 2025.

HERITAGE ENERGY OPERATING, LLC

By 
Uriah J. Price, Its Attorney
Crowley Fleck, PLLP
P. O. Box 10969
Bozeman, MT 59719
uprice@crowleyfleck.com

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MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

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

IN THE MATTER OF THE APPLICATION OF HERITAGE ENERGY OPERATING, LLC FOR AN ORDER AUTHORIZING THE DRILLING OF UP TO THREE (3) ADDITIONAL HORIZONTAL BAKKEN/THREE FORKS FORMATION WELLS IN THE TEMPORARY SPACING UNIT ("TSU") COMPRISED OF ALL OF SECTIONS 3, 10 AND 15, TOWNSHIP 25 NORTH, RANGE 56 EAST, M.P.M., RICHLAND COUNTY, MONTANA, AT ANY LOCATION NOT CLOSER THAN 200' (HEEL TOE SETBACK) / 500' (LATERAL SETBACK) TO THE BOUNDARIES OF THE TSU, AND SUCH OTHER AND FURTHER RELIEF AS THE BOARD MAY DEEM APPROPRIATE.

MBOGC DOCKET NO. 384-2025

APPLICATION

HERITAGE ENERGY OPERATING, LLC, 2448 E. 81st Street, Suite 3600, Tulsa, OK 74137:

[A] Presents the following application:

1. Applicant is an interest owner within all or portions of Sections 3, 10 and 15, Township 25 North, Range 56 East, M.P.M., Richland County, Montana, which comprise a temporary spacing unit ("TSU") for purposes of Bakken/Three Forks formation production pursuant to Board Order No. 49-2025.
2. Applicant requests authority to drill up to three (3) additional horizontal Bakken/Three Forks formation wells within the TSU, at any location not closer than 200' (heel toe setback) / 500' (lateral setback) to the exterior boundaries thereof, if in its judgment as operator of the TSU such operations appear reasonable and prudent.
3. The E½ of Section 15, Township 25 North, Range 56 East, M.P.M., includes federal minerals and, therefore, the MOU between the United States BLM and the Board is applicable.

[B] Requests:

1. This matter be set for hearing, with notice given as required by law and the MOU;
2. After hearing the matter, the Board enter its order authorizing the Applicant to drill up to three (3) additional horizontal Bakken/Three Forks formation wells at any location within, but not closer than 200' (heel toe setback) / 500' (lateral setback) to the exterior boundaries of, the TSU comprised of all of Sections 3, 10 and 15, Township 25 North, Range 56 East, M.P.M., Richland County, Montana, and such other and further relief as the Board may deem appropriate.

Dated this 30th day of October, 2025.

HERITAGE ENERGY OPERATING, LLC

By



Uriah J. Price, Its Attorney
Crowley Fleck, PLLP
P. O. Box 10969
Bozeman, MT 59719
uprice@crowleyfleck.com

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MONTANA BOARD OF OIL & GAS CONSERVATION • BILLINGS, MT

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

IN THE MATTER OF THE APPLICATION OF HERITAGE ENERGY OPERATING, LLC FOR AN ORDER AUTHORIZING THE DRILLING OF UP TO THREE (3) ADDITIONAL HORIZONTAL BAKKEN/THREE FORKS FORMATION WELLS IN THE TEMPORARY SPACING UNIT ("TSU") COMPRISED OF ALL OF SECTIONS 2, 11 AND 14, TOWNSHIP 25 NORTH, RANGE 56 EAST, M.P.M., RICHLAND COUNTY, MONTANA, AT ANY LOCATION NOT CLOSER THAN 200' (HEEL TOE SETBACK) / 500' (LATERAL SETBACK) TO THE BOUNDARIES OF THE TSU, AND SUCH OTHER AND FURTHER RELIEF AS THE BOARD MAY DEEM APPROPRIATE.

MBOGC DOCKET NO. 385-2025

APPLICATION

HERITAGE ENERGY OPERATING, LLC, 2448 E. 81st Street, Suite 3600, Tulsa, OK 74137:

[A] Presents the following application:

1. Applicant is an interest owner within all or portions of Sections 2, 11 and 14, Township 25 North, Range 56 East, M.P.M., Richland County, Montana, which comprise a temporary spacing unit ("TSU") for purposes of Bakken/Three Forks formation production pursuant to Board Order No. 48-2025.
2. Applicant requests authority to drill up to three (3) additional horizontal Bakken/Three Forks formation wells within the TSU, at any location not closer than 200' (heel toe setback) / 500' (lateral setback) to the exterior boundaries thereof, if in its judgment as operator of the TSU such operations appear reasonable and prudent.
3. There are no federal minerals within the proposed TSU.

[B] Requests:

1. This matter be set for hearing, with notice given as required by law and the MOU;
2. After hearing the matter, the Board enter its order authorizing the Applicant to drill up to three (3) additional horizontal Bakken/Three Forks formation wells at any location within, but not closer than 200' (heel toe setback) / 500' (lateral setback) to the exterior boundaries of, the TSU comprised of all of Sections 2, 11 and 14, Township 25 North, Range 56 East, M.P.M., Richland County, Montana, and such other and further relief as the Board may deem appropriate.

Dated this 30th day of October, 2025.

HERITAGE ENERGY OPERATING, LLC

By



Uriah J. Price, Its Attorney
Crowley Fleck, PLLP
P. O. Box 10969
Bozeman, MT 59719
uprice@crowleyfleck.com

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NOV 03 2025

MONTANA BOARD OF OIL &
GAS CONSERVATION • BUTTE, MT

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

IN THE MATTER OF THE APPLICATION OF HERITAGE ENERGY OPERATING, LLC FOR AN ORDER AUTHORIZING THE DRILLING OF UP TO THREE (3) ADDITIONAL HORIZONTAL BAKKEN/THREE FORKS FORMATION WELLS IN THE TEMPORARY SPACING UNIT ("TSU") COMPRISED OF ALL OF SECTIONS 1, 12 AND 13, TOWNSHIP 25 NORTH, RANGE 56 EAST, M.P.M., RICHLAND COUNTY, MONTANA, AT ANY LOCATION NOT CLOSER THAN 200' (HEEL TOE SETBACK) / 500' (LATERAL SETBACK) TO THE BOUNDARIES OF THE TSU, AND SUCH OTHER AND FURTHER RELIEF AS THE BOARD MAY DEEM APPROPRIATE.

MBOGC DOCKET NO. 386-2025

APPLICATION

HERITAGE ENERGY OPERATING, LLC, 2448 E. 81st Street, Suite 3600, Tulsa, OK 74137:

[A] Presents the following application:

1. Applicant is an interest owner within all or portions of Sections 1, 12 and 13, Township 25 North, Range 56 East, M.P.M., Richland County, Montana, which comprise a temporary spacing unit ("TSU") for purposes of Bakken/Three Forks formation production pursuant to Board Order No. 47-2025.
2. Applicant requests authority to drill up to three (3) additional horizontal Bakken/Three Forks formation wells within the TSU, at any location not closer than 200' (heel toe setback) / 500' (lateral setback) to the exterior boundaries thereof, if in its judgment as operator of the TSU such operations appear reasonable and prudent.
3. There are no federal minerals within the proposed TSU.

[B] Requests:

1. This matter be set for hearing, with notice given as required by law and the MOU;
2. After hearing the matter, the Board enter its order authorizing the Applicant to drill up to three (3) additional horizontal Bakken/Three Forks formation wells at any location within, but not closer than 200' (heel toe setback) / 500' (lateral setback) to the exterior boundaries of, the TSU comprised of all of Sections 1, 12 and 13, Township 25 North, Range 56 East, M.P.M., Richland County, Montana, and such other and further relief as the Board may deem appropriate.

Dated this 30th day of October, 2025.

HERITAGE ENERGY OPERATING, LLC

By



Uriah J. Price, Its Attorney
Crowley Fleck, PLLP
P. O. Box 10969
Bozeman, MT 59719
uprice@crowleyfleck.com

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MONTANA BOARD OF OIL AND GAS CONSERVATION

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

IN THE MATTER OF THE APPLICATION OF BALDWIN LYNCH ENERGY CORPORATION FOR AN ORDER DESIGNATING A 320 ACRE OVERLAPPING TEMPORARY SPACING UNIT ("OTSU"), COMPRISED OF THE SW¼ OF SECTION 15 AND THE NW¼ OF SECTION 22, TOWNSHIP 9 SOUTH, RANGE 22 EAST, CARBON COUNTY, MONTANA, FOR PURPOSES OF DRILLING A LAKOTA FORMATION OIL AND GAS TEST WELL AT A LOCATION APPROXIMATELY 2120' FSL AND 600' FEL OF SUCH OTSU BOUNDARIES, AS AN EXCEPTION TO A.R.M. 36.22.702, CLARIFYING BOARD ORDER 339-2008, AND ANY OTHER RELIEF THAT THE MBOGC MAY DEEM APPROPRIATE.

MBOGC DOCKET NO. 387-2025

APPLICATION

BALDWIN LYNCH ENERGY CORPORATION, 1001A EAST HARMONY ROAD #368, FORT COLLINS, CO 80525:

[A] Presents the following application:

1. Applicant is an interest owner within all or portions of the SW¼ of Section 15 and the NW¼ of Section 22, Township 9 South, Range 22 East, Carbon County, Montana. The NW¼SW¼ of Section 15 is subject to Board Order 339-2008. The remainder of the captioned lands are subject to A.R.M. 36.22.702.

2. Applicant requests that the SW¼ of Section 15 and the NW¼ of Section 22, Township 9 South, Range 22 East, Carbon County, Montana, be designated an overlapping temporary spacing unit ("OTSU") for purposes of drilling a Lakota Formation oil and gas test well at a location approximately 2120' FSL and 600' FEL of such OTSU boundaries, as an exception to A.R.M. 36.22.702. To preserve correlative rights of all interest owners in the existing permanent spacing unit comprised of the W½NW¼ and NW¼SW¼ of Section 15 and the E½NE¼ and NE¼SE¼ of Section 16, Township 9 South, Range 22 East, Board Order 339-2008 should be amended to clarify that such order is limited to oil and associated natural gas produced from the Lakota formation from the Baldwin Federal 12-15 well.

3. The SW¼ of Section 15 and the NW¼ of Section 22, Township 9 South, Range 22 East, are comprised of federal minerals and, therefore, the MOU between the United States BLM and the Board is applicable.

4. Applicant will, within 90 days of successful completion of the proposed horizontal operation, file an application for the Board's consideration of permanent spacing and other matters relating to production from the well.

[B] Requests:

1. This matter be set for hearing, with notice given as required by law and the MOU;

2. After hearing the matter, the Board enter its order (i) creating an OTSU comprised of the SW¼ of Section 15 and the NW¼ of Section 22, Township 9 South, Range 22 East, Carbon County, Montana, and authorizing the drilling of a Lakota formation oil and gas test well at a location approximately 2120' FSL and 600' FEL of such OTSU boundaries, as an exception to A.R.M. 36.22.702; (ii) amending Board Order 339-2008 to


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clarify that the Order is limited to oil and associated natural gas produced from the Lakota formation from the Baldwin Federal 12-15 well; and (iii) any other relief as the Board may deem appropriate.

Dated this 30th day of October, 2025.

BALDWIN LYNCH ENERGY CORPORATION

By 
Uriah J. Price, Its Attorney
Crowley Fleck, PLLP
P. O. Box 10969
Bozeman, MT 59719
uprice@crowleyfleck.com

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MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

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

IN THE MATTER OF THE APPLICATION OF WHITE ROCK OIL & GAS, LLC FOR AN ORDER CREATING AN OVERLAPPING TEMPORARY SPACING UNIT ("OTSU") COMPRISED OF ALL OF SECTIONS 7, 8, 17, 18, 19 AND 20, TOWNSHIP 22 NORTH, RANGE 58 EAST, M.P.M., RICHLAND COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT A LOCATION PROXIMATE TO THE COMMON BOUNDARY BETWEEN SECTIONS 7 AND 8, THE PERMANENT SPACING UNIT ("PSU") COMPRISED OF SECTION 17, THE PSU COMPRISED OF SECTION 18, THE PSU COMPRISED OF SECTION 19, AND THE PSU COMPRISED OF SECTION 20, ALL IN TOWNSHIP 22 NORTH, RANGE 58 EAST, RICHLAND COUNTY, MONTANA, AND ANY OTHER RELIEF THAT THE BOARD MAY DEEM APPROPRIATE.

MBOGC DOCKET NO. 388-2025
APPLICATION

WHITE ROCK OIL & GAS, LLC, 5810 TENNYSON PKWY, SUITE 500, PLANO, TX 75024:

[A] Presents the following application:

1. Applicant is an interest owner within all or portions of Sections 7, 8, 17, 18, 19 and 20, Township 22 North, Range 58 East, M.P.M., Richland County, Montana. The W½ of Section 7, Township 22 North, Range 58 East, comprise a permanent spacing unit ("PSU") for purposes of Bakken/Three Forks formation per Board Order 81-2005, and White Rock Oil & Gas, LLC operates the well within the PSU. The E½ of Section 7 and all of Section 8, Township 22 North, Range 58 East, comprise a PSU for purposes of Bakken/Three Forks formation per Board Order 38-2006, and White Rock Oil & Gas, LLC operates the wells within the PSU. All of Section 17, Township 22 North, Range 58 East, comprise a PSU for purposes of Bakken/Three Forks formation per Board Order 288-2007, and White Rock Oil & Gas, LLC operates the well within the PSU. All of Section 18, Township 22 North, Range 58 East, comprise a PSU for purposes of Bakken/Three Forks formation per Board Order 89-2006, and White Rock Oil & Gas, LLC operates the wells within the PSU. All of Section 19, Township 22 North, Range 58 East, comprise a PSU for purposes of Bakken/Three Forks formation per Board Order 294-2010, and White Rock Oil & Gas, LLC operates the well within the PSU. All of Section 20, Township 22 North, Range 58 East, comprise a PSU for purposes of Bakken/Three Forks formation per Board Order 300-2006, and White Rock Oil & Gas, LLC operates the well within the PSU.

2. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill a horizontal Bakken/Three Forks formation well in an OTSU comprised of all of Sections 7, 8, 17, 18, 19 and 20, Township 22 North, Range 58 East, M.P.M., Richland County, Montana. The well will be drilled at a location proximate to the common boundary between all of Sections 7, 18 and 19, Township 22 North, Range 58 East, and all of Sections 8, 17 and 20, Township 22 North, Range 58 East, with a heel/toe setback of 200'.

3. Applicant will, within 90 days of successful completion of the proposed horizontal operation, file an application for the Board's consideration of permanent spacing and other matters relating to production from the well.

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


[B] Requests:

1. This matter be set for hearing, with notice given as required by law and the MOU;

2. After hearing the matter, the Board enter its order **(i)** creating an OTSU comprised of all of Sections 7, 8, 17, 18, 19 and 20, Township 22 North, Range 58 East, M.P.M., Richland County, Montana, for purposes of drilling a horizontal Bakken/Three Forks formation well at a location proximate to the common boundary between all of Sections 7, 18 and 19, Township 22 North, Range 58 East, and all of Sections 8, 17 and 20, Township 22 North, Range 58 East, with a heel/toe setback of 200', and providing that the OTSU shall be limited to production from the proposed horizontal well with no allocation to portions of any existing spacing unit located outside of the OTSU boundaries; and **(ii)** any other relief that the Board deems appropriate.

Dated this 4th day of November, 2025.

WHITE ROCK OIL & GAS, LLC

By  _____
Uriah J. Price, Its Attorney
Crowley Fleck, PLLP
P. O. Box 10969
Bozeman, MT 59719
uprice@crowleyfleck.com

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NOV 07 2025

MONTANA BOARD OF OIL & GAS CONSERVATION • BILLINGS

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

IN THE MATTER OF THE APPLICATION OF WHITE ROCK OIL & GAS, LLC FOR AN ORDER CREATING AN OVERLAPPING TEMPORARY SPACING UNIT ("OTSU") COMPRISED OF ALL OF SECTIONS 8, 9, 16, 17, 20 AND 21, TOWNSHIP 22 NORTH, RANGE 58 EAST, M.P.M., RICHLAND COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT A LOCATION PROXIMATE TO THE COMMON BOUNDARY BETWEEN SECTION 8, THE PERMANENT SPACING UNIT ("PSU") COMPRISED OF SECTION 9, THE PSU COMPRISED OF SECTION 16, THE PSU COMPRISED OF SECTION 17, THE PSU COMPRISED OF SECTION 20, AND THE PSU COMPRISED OF SECTION 21, ALL IN TOWNSHIP 22 NORTH, RANGE 58 EAST, RICHLAND COUNTY, MONTANA, AND ANY OTHER RELIEF THAT THE BOARD MAY DEEM APPROPRIATE.

MBOGC DOCKET NO. 389-2015
APPLICATION

WHITE ROCK OIL & GAS, LLC, 5810 TENNYSON PKWY, SUITE 500, PLANO, TX 75024:

[A] Presents the following application:

1. Applicant is an interest owner within all or portions of Sections 8, 9, 16, 17, 20 and 21, Township 22 North, Range 58 East, M.P.M., Richland County, Montana. All of Section 8 (along with the E½ of Section 7), Township 22 North, Range 58 East, comprise a PSU for purposes of Bakken/Three Forks formation per Board Order 38-2006, and White Rock Oil & Gas, LLC operates the wells within the PSU. All of Section 9, Township 22 North, Range 58 East, comprise a PSU for purposes of Bakken/Three Forks formation per Board Order 39-2006, and White Rock Oil & Gas, LLC operates the well within the PSU. All of Section 16, Township 22 North, Range 58 East, comprise a PSU for purposes of Bakken/Three Forks formation per Board Order 236-2007, and MorningStar Operating LLC operates the well within the PSU. All of Section 17, Township 22 North, Range 58 East, comprise a PSU for purposes of Bakken/Three Forks formation per Board Order 288-2007, and White Rock Oil & Gas, LLC operates the well within the PSU. All of Section 20, Township 22 North, Range 58 East, comprise a PSU for purposes of Bakken/Three Forks formation per Board Order 300-2006, and White Rock Oil & Gas, LLC operates the well within the PSU. All of Section 21, Township 22 North, Range 58 East, comprise a PSU for purposes of Bakken/Three Forks formation per Board Order 295-2010, and White Rock Oil & Gas, LLC operates the well within the PSU.

2. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill a horizontal Bakken/Three Forks formation well in an OTSU comprised of all of Sections 8, 9, 16, 17, 20 and 21, Township 22 North, Range 58 East, M.P.M., Richland County, Montana. The well will be drilled at a location proximate to the common boundary between all of Sections 9, 16 and 21, Township 22 North, Range 58 East, and all of Sections 8, 17 and 20, Township 22 North, Range 58 East, with a heel/toe setback of 200'.

3. Applicant will, within 90 days of successful completion of the proposed horizontal operation, file an application for the Board's consideration of permanent spacing and other matters relating to production from the well.

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

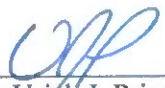
[B] Requests:

1. This matter be set for hearing, with notice given as required by law and the MOU;

2. After hearing the matter, the Board enter its order (i) creating an OTSU comprised of all of Sections 8, 9, 16, 17, 20 and 21, Township 22 North, Range 58 East, M.P.M., Richland County, Montana, for purposes of drilling a horizontal Bakken/Three Forks formation well at a location proximate to the common boundary between all of Sections 9, 16 and 21, Township 22 North, Range 58 East, and all of Sections 8, 17 and 20, Township 22 North, Range 58 East, with a heel/toe setback of 200', and providing that the OTSU shall be limited to production from the proposed horizontal well with no allocation to portions of any existing spacing unit located outside of the OTSU boundaries; and (ii) any other relief that the Board deems appropriate.

Dated this 4th day of November, 2025.

WHITE ROCK OIL & GAS, LLC

By  _____
Uriah J. Price, Its Attorney
Crowley Fleck, PLLP
P. O. Box 10969
Bozeman, MT 59719
uprice@crowleyfleck.com

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

IN THE MATTER OF THE APPLICATION OF WHITE ROCK OIL & GAS, LLC FOR AN ORDER CREATING AN OVERLAPPING TEMPORARY SPACING UNIT ("OTSU") COMPRISED OF ALL OF SECTIONS 8, 17, 20 AND 29, TOWNSHIP 22 NORTH, RANGE 58 EAST, M.P.M., RICHLAND COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT ANY LOCATION NOT CLOSER THAN 200' (HEEL TOE SETBACK) / 500' (LATERAL SETBACK) TO THE BOUNDARIES OF THE OTSU, CLARIFYING BOARD ORDER NOS. 38-2006, 288-2007, 300-2006 & 296-2010, VACATING BOARD ORDER NO. 301-2006, AND ANY OTHER RELIEF THAT THE BOARD MAY DEEM APPROPRIATE.

MBOGC DOCKET NO. 390-2025

APPLICATION

WHITE ROCK OIL & GAS, LLC, 5810 TENNYSON PKWY, SUITE 500, PLANO, TX 75024:

[A] Presents the following application:

1. Applicant is an interest owner within all or portions of Sections 8, 17, 20 and 29, Township 22 North, Range 58 East, M.P.M., Richland County, Montana. Section 8 (along with the E½ of Section 7) is presently subject to Board Order Nos. 38-2006 (PSU) and 168-2006 (increased density), and White Rock Oil & Gas, LLC operates the Qualley 4-8H and Qualley 10-8H wells located in the PSU. Section 17 is subject to Board Order No. 288-2007 (PSU), and White Rock Oil & Gas, LLC operates the BR 11-17H 28 well located in the PSU comprised of Section 17, Township 22 North, Range 58 East. Section 20 is subject to Board Order Nos. 300-2006 (PSU) and 301-2006 (increased density), and White Rock Oil & Gas, LLC operates the Simard Farms 4-20H well located in the PSU comprised of Section 20, Township 22 North, Range 58 East. Section 29 is subject to Board Order No. 296-2010 (PSU), and White Rock Oil & Gas, LLC operates the BR 41-29H 28 well located in the PSU comprised of Section 29, Township 22 North, Range 58 East.

2. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill a horizontal Bakken/Three Forks formation well at a location within, but not closer than 200' (heel toe setback) / 500' (lateral setback) to the exterior boundaries of, an OTSU comprised of Sections 8, 17, 20 and 29, Township 22 North, Range 58 East, M.P.M., Richland County, Montana. To preserve correlative rights of all interest owners in Section 8 (along with the E½ of Section 7), Board Order No. 38-2006 should be amended to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the Qualley 4-8H and Qualley 10-8H wells. To preserve correlative rights of all interest owners in Section 17, Board Order No. 288-2007 should be amended to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the BR 11-17H 28 well. To preserve correlative rights of all interest owners in Section 20, Board Order No. 300-2006 should be amended to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the Simard Farms 4-20H well. It will also be necessary to vacate Board Order No. 301-2006. To preserve correlative rights of all interest owners in Section 29, Board Order No. 296-2010 should be amended to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the BR 41-29H 28 well.

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

3. Applicant will, within 90 days of successful completion of the proposed horizontal operation, file an application for the Board's consideration of permanent spacing and other matters relating to production from the well.

[B] Requests:

1. This matter be set for hearing, with notice given as required by law and the MOU;

2. After hearing the matter, the Board enter its order (i) creating an OTSU comprised of ALL of Sections 8, 17, 20 and 29, Township 22 North, Range 58 East, M.P.M., Richland County, Montana, and authorizing the drilling of a horizontal Bakken/Three Forks formation well at any location within such OTSU but not closer than 200' (heel toe setback) / 500' (lateral setback) to the exterior boundaries thereof; (ii) amending Board Order 38-2006 to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the Qualley 4-8H and Qualley 10-8H wells; (iii) amending Board Order 288-2007 to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the BR 11-17H 28 well; (iv) amending Board Order 300-2006 to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the Simard Farms 4-20H well; (v) amending Board Order 296-2010 to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the BR 41-29H 28 well; (vi) vacating Board Order No. 301-2006; and (vii) any other relief as the Board may deem appropriate.

Dated this 4th day of November, 2025.

WHITE ROCK OIL & GAS, LLC

By



Uriah J. Price, Its Attorney
Crowley Fleck, PLLP
P. O. Box 10969
Bozeman, MT 59719
uprice@crowleyfleck.com

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

IN THE MATTER OF THE APPLICATION OF WHITE ROCK OIL & GAS, LLC FOR AN ORDER AUTHORIZING THE DRILLING OF ONE (1) ADDITIONAL HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL IN THE OVERLAPPING TEMPORARY SPACING UNIT ("OTSU") COMPRISED OF ALL OF SECTIONS 8, 17, 20 AND 29, TOWNSHIP 22 NORTH, RANGE 58 EAST, M.P.M., RICHLAND COUNTY, MONTANA, AT ANY LOCATION NOT CLOSER THAN 200' (HEEL TOE SETBACK) / 500' (LATERAL SETBACK) TO THE BOUNDARIES OF THE OTSU, AND ANY OTHER RELIEF THAT THE BOARD MAY DEEM APPROPRIATE.

MBOGC DOCKET NO. 391-2025

APPLICATION

WHITE ROCK OIL & GAS, LLC, 5810 TENNYSON PKWY, SUITE 500, PLANO, TX 75024:

[A] Presents the following application:

1. Applicant is an interest owner within all or portions of Sections 8, 17, 20 and 29, Township 22 North, Range 58 East, M.P.M., Richland County, Montana. It is anticipated that such lands will comprise an OTSU for purposes of Bakken/Three Forks formation pursuant to Montana Board of Oil and Gas Conservation No. ____ - 2025.

2. Applicant requests authority to drill one (1) additional horizontal Bakken/Three Forks formation well within the OTSU, at any location not closer than 200' (heel toe setback) / 500' (lateral setback) to the exterior boundaries thereof, if in its judgment as operator of the OTSU such operations appear reasonable and prudent.

[B] Requests:

1. This matter be set for hearing, with notice given as required by law and the MOU;

2. After hearing the matter, the Board enter its order authorizing the Applicant to drill one (1) additional horizontal Bakken/Three Forks formation well at any location within, but not closer than 200' (heel toe setback) / 500' (lateral setback) to the exterior boundaries of, the OTSU comprised of all of Sections 8, 17, 20 and 29, Township 22 North, Range 58 East, M.P.M., Richland County, Montana, and such other and further relief as the Board may deem appropriate.

Dated this 4th day of November, 2025.

WHITE ROCK OIL & GAS, LLC

By



Uriah J. Price, Its Attorney
Crowley Fleck, PLLP
P. O. Box 10969
Bozeman, MT 59719
uprice@crowleyfleck.com

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MONTANA BOARD OF OIL &
GAS CONSERVATION • 815 LAFAYETTE

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

IN THE MATTER OF THE APPLICATION OF WHITE ROCK OIL & GAS, LLC FOR AN ORDER CREATING AN OVERLAPPING TEMPORARY SPACING UNIT ("OTSU") COMPRISED OF ALL OF SECTIONS 7, 18 AND 19, TOWNSHIP 22 NORTH, RANGE 58 EAST, M.P.M., RICHLAND COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT ANY LOCATION NOT CLOSER THAN 200' (HEEL TOE SETBACK) / 500' (LATERAL SETBACK) TO THE BOUNDARIES OF THE OTSU, CLARIFYING BOARD ORDER NOS. 38-2006, 81-2005, 89-2006 & 294-2010, AND ANY OTHER RELIEF THAT THE BOARD MAY DEEM APPROPRIATE.

MBOGC DOCKET NO. 392-2025

APPLICATION

WHITE ROCK OIL & GAS, LLC, 5810 TENNYSON PKWY, SUITE 500, PLANO, TX 75024:

[A] Presents the following application:

1. Applicant is an interest owner within all or portions of Sections 7, 18 and 19, Township 22 North, Range 58 East, M.P.M., Richland County, Montana. The E½ of Section 7 (along with all of Section 8) is presently subject to Board Order Nos. 38-2006 (PSU) and 168-2006 (increased density), and White Rock Oil & Gas, LLC operates the Qualley 4-8H and Qualley 10-8H wells located in the PSU comprised of the E½ of Section 7 and all of Section 8, Township 22 North, Range 58 East. The W½ of Section 7 is subject to Board Order No. 81-2005 (PSU), and White Rock Oil & Gas, LLC operates the W.E. McChesney, Jr 2 well located in the PSU comprised of the W½ of Section 7, Township 22 North, Range 58 East. Section 18 is subject to Board Order Nos. 89-2006 (PSU) and 90-2006 (increased density), and White Rock Oil & Gas, LLC operates the Anvik 4-18H and Anvik 16-18H wells located in the PSU comprised of Section 18, Township 22 North, Range 58 East. Section 19 is subject to Board Order No. 294-2010 (PSU), and White Rock Oil & Gas, LLC operates the BR 41-19H 28 well located in the PSU comprised of Section 19, Township 22 North, Range 58 East.

2. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill a horizontal Bakken/Three Forks formation well at a location within, but not closer than 200' (heel toe setback) / 500' (lateral setback) to the exterior boundaries of, an OTSU comprised of Sections 7, 18 and 19, Township 22 North, Range 58 East, M.P.M., Richland County, Montana. To preserve correlative rights of all interest owners in the E½ of Section 7 (along with all of Section 8), Board Order No. 38-2006 should be amended to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the Qualley 4-8H and Qualley 10-8H wells. To preserve correlative rights of all interest owners in the W½ of Section 7, Board Order No. 81-2005 should be amended to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the W.E. McChesney, Jr 2 well. To preserve correlative rights of all interest owners in Section 18, Board Order No. 89-2006 should be amended to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the Anvik 4-18H and Anvik 16-18H wells. To preserve correlative rights of all interest owners in Section 19, Board Order No. 294-2010 should be amended to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the BR 41-19H 28 well.

3. Applicant will, within 90 days of successful completion of the proposed horizontal operation, file an application for the Board's consideration of permanent spacing and other matters relating to production from the well.

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[B] Requests:

1. This matter be set for hearing, with notice given as required by law and the MOU;

2. After hearing the matter, the Board enter its order (i) creating an OTSU comprised of ALL of Sections 7, 18 and 19, Township 22 North, Range 58 East, M.P.M., Richland County, Montana, and authorizing the drilling of a horizontal Bakken/Three Forks formation well at any location within such OTSU but not closer than 200' (heel toe setback) / 500' (lateral setback) to the exterior boundaries thereof; (ii) amending Board Order 38-2006 to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the Qualley 4-8H and Qualley 10-8H wells; (iii) amending Board Order 81-2005 to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the W.E. McChesney, Jr 2 well; (iv) amending Board Order 89-2006 to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the Anvik 4-18H and Anvik 16-18H wells; (v) amending Board Order 294-2010 to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the BR 41-19H 28 well; and (vi) any other relief as the Board may deem appropriate.

Dated this 4th day of November, 2025.

WHITE ROCK OIL & GAS, LLC

By

Utah J. Price, Its Attorney
Crowley Fleck, PLLP
P. O. Box 10969
Bozeman, MT 59719
uprice@crowleyfleck.com

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

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

IN THE MATTER OF THE APPLICATION OF WHITE ROCK OIL & GAS, LLC FOR AN ORDER AUTHORIZING THE DRILLING OF ONE (1) ADDITIONAL HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL IN THE OVERLAPPING TEMPORARY SPACING UNIT ("OTSU") COMPRISED OF ALL OF SECTIONS 7, 18 AND 19, TOWNSHIP 22 NORTH, RANGE 58 EAST, M.P.M., RICHLAND COUNTY, MONTANA, AT ANY LOCATION NOT CLOSER THAN 200' (HEEL TOE SETBACK) / 500' (LATERAL SETBACK) TO THE BOUNDARIES OF THE OTSU, AND ANY OTHER RELIEF THAT THE BOARD MAY DEEM APPROPRIATE.

MBOGC DOCKET NO. 393-2025

APPLICATION

WHITE ROCK OIL & GAS, LLC, 5810 TENNYSON PKWY, SUITE 500, PLANO, TX 75024:

[A] Presents the following application:

1. Applicant is an interest owner within all or portions of Sections 7, 18 and 19, Township 22 North, Range 58 East, M.P.M., Richland County, Montana. It is anticipated that such lands will comprise an OTSU for purposes of Bakken/Three Forks formation pursuant to Montana Board of Oil and Gas Conservation No. ____-2025.
2. Applicant requests authority to drill one (1) additional horizontal Bakken/Three Forks formation well within the OTSU, at any location not closer than 200' (heel toe setback) / 500' (lateral setback) to the exterior boundaries thereof, if in its judgment as operator of the OTSU such operations appear reasonable and prudent.

[B] Requests:

1. This matter be set for hearing, with notice given as required by law and the MOU;
2. After hearing the matter, the Board enter its order authorizing the Applicant to drill one (1) additional horizontal Bakken/Three Forks formation well at any location within, but not closer than 200' (heel toe setback) / 500' (lateral setback) to the exterior boundaries of, the OTSU comprised of all of Sections 7, 18 and 19, Township 22 North, Range 58 East, M.P.M., Richland County, Montana, and such other and further relief as the Board may deem appropriate.

Dated this 4th day of November, 2025.

WHITE ROCK OIL & GAS, LLC

By



Uriah J. Price, Its Attorney
Crowley Fleck, PLLP
P. O. Box 10969
Bozeman, MT 59719
uprice@crowleyfleck.com

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MONTANA BOARD OF OIL & GAS CONSERVATION • BILLINGS

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

IN THE MATTER OF THE APPLICATION OF WHITE ROCK OIL & GAS, LLC FOR AN ORDER AUTHORIZING THE DRILLING OF ONE (1) ADDITIONAL HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL IN THE PERMANENT SPACING UNIT ("PSU") COMPRISED OF ALL OF SECTION 19, TOWNSHIP 23 NORTH, RANGE 57 EAST, M.P.M., RICHLAND COUNTY, MONTANA, AT ANY LOCATION NOT CLOSER THAN 200' (HEEL TOE SETBACK) / 500' (LATERAL SETBACK) TO THE BOUNDARIES OF THE PSU, AND SUCH OTHER AND FURTHER RELIEF AS THE BOARD MAY DEEM APPROPRIATE.

MBOGC DOCKET NO. 394-2025

APPLICATION

WHITE ROCK OIL & GAS, LLC, 5810 TENNYSON PKWY, SUITE 500, PLANO, TX 75024:

[A] Presents the following application:

1. Applicant is an interest owner within all or portions of Section 19, Township 23 North, Range 57 East, M.P.M., Richland County, Montana. These lands comprise a PSU for purposes of Bakken/Three Forks formation production pursuant to Board Order 96-2005, and applicant operates the Nevins 15-19H well within such PSU.

2. To recover additional Bakken/Three Forks formation reserves underlying the captioned lands, Applicant requests authority to drill one (1) additional horizontal Bakken/Three Forks formation well within the PSU, at any location not closer than 200' (heel toe setback) / 500' (lateral setback) to the exterior boundaries thereof.

[B] Requests:

1. This matter be set for hearing, with notice given as required by law and the MOU;

2. After hearing the matter, the Board enter its order (i) authorizing the Applicant to drill one (1) additional horizontal Bakken/Three Forks formation well at any location within, but not closer than 200' (heel toe setback) / 500' (lateral setback) to the exterior boundaries of the PSU comprised of Section 19, Township 23 North, Range 57 East, M.P.M., Richland County, Montana; and (ii) such other and further relief as the Board may deem appropriate.

Dated this 4th day of November, 2025.

WHITE ROCK OIL & GAS, LLC

By



Uriah J. Price, Its Attorney
Crowley Fleck, PLLP
P. O. Box 10969
Bozeman, MT 59719
uprice@crowleyfleck.com

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

IN THE MATTER OF THE APPLICATION OF WHITE ROCK OIL & GAS, LLC FOR AN ORDER CREATING AN OVERLAPPING TEMPORARY SPACING UNIT ("OTSU") COMPRISED OF ALL OF SECTIONS 34 & 35, TOWNSHIP 26 NORTH, RANGE 54 EAST, AND ALL OF SECTIONS 2, 3, 10, 11, 14 & 15, TOWNSHIP 25 NORTH, RANGE 54 EAST, M.P.M., RICHLAND COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT A LOCATION PROXIMATE TO THE COMMON BOUNDARY BETWEEN THE PSU COMPRISED OF SECTION 34, TOWNSHIP 26 NORTH, RANGE 54 EAST, THE PSU COMPRISED OF SECTION 3, TOWNSHIP 25 NORTH, RANGE 54 EAST, THE PSU COMPRISED OF SECTION 10, TOWNSHIP 25 NORTH, RANGE 54 EAST, THE PSU COMPRISED OF SECTION 15, TOWNSHIP 25 NORTH, RANGE 54 EAST, & THE PSU COMPRISED OF SECTION 35, TOWNSHIP 26 NORTH, RANGE 54 EAST, THE PSU COMPRISED OF SECTION 2, TOWNSHIP 25 NORTH, RANGE 54 EAST, AND THE PSU COMPRISED OF SECTIONS 11 AND 14, TOWNSHIP 25 NORTH, RANGE 54 EAST AND ANY OTHER RELIEF THAT THE BOARD MAY DEEM APPROPRIATE.

MBOGC DOCKET NO. 395-2025
APPLICATION

WHITE ROCK OIL & GAS, LLC, 5810 TENNYSON PKWY, SUITE 500, PLANO, TX 75024:

[A] Presents the following application:

1. Applicant is an interest owner within all or portions of Sections 34 and 35, Township 26 North, Range 54 East, and Sections 2, 3, 10, 11, 14 and 15, Township 25 North, Range 54 East, M.P.M., Richland County, Montana. Section 35, Township 26 North, Range 54 East, comprise a permanent spacing unit ("PSU") formed by Board Order No. 286-2007, and White Rock Oil & Gas, LLC operates the well within the PSU. Section 34, Township 26 North, Range 54 East, comprise a PSU formed by Board Order No. 249-2007, and Continental Resources Inc. operates the well within the PSU. Section 2, Township 25 North, Range 54 East, comprise a PSU formed by Board Order No. 427-2006, and Continental Resources Inc. operates the well within the PSU. Section 3, Township 25 North, Range 54 East, comprise a PSU formed by Board Order No. 290-2010, and White Rock Oil & Gas, LLC operates the well within the PSU. Section 10, Township 25 North, Range 54 East, comprise a PSU formed by Board Order No. 323-2007, and Continental Resources Inc. operates the well within the PSU. Sections 11 and 14, Township 25 North, Range 54 East, comprise a PSU formed by Board Order 172-2006, and White Rock Oil & Gas, LLC operates the wells within the PSU. Section 15, Township 25 North, Range 54 East, comprise a PSU formed by Board Order No. 259-2006, and MorningStar Operating LLC operates the well within the PSU.

2. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill a horizontal Bakken/Three Forks formation well in an OTSU comprised of all of Sections 34 and 35, Township 26 North, Range 54 East, and Sections 2, 3, 10, 11, 14 and 15, Township 25 North, Range 54 East, M.P.M., Richland County, Montana. The well will be drilled at a location proximate to the common boundary between all of Section 34, Township 26 North, Range 54 East, and Sections 3, 10 and 15, Township 25 North, Range 54 East, & all of Section 35, Township 26 North, Range 54 East, and Sections 2, 11 and 14, Township 25 North, Range 54 East, with a heel/toe setback of 200'.

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3. The E½ of Section 15 and the W½ of Section 14, Township 25 North, Range 54 East, include federal minerals and, therefore, the MOU between the United States BLM and the Board is applicable.

4. Applicant will, within 90 days of successful completion of the proposed horizontal operation, file an application for the Board's consideration of permanent spacing and other matters relating to production from the well.

[B] Requests:

1. This matter be set for hearing, with notice given as required by law and the MOU;

2. After hearing the matter, the Board enter its order (i) creating an OTSU comprised of all of Sections 34 and 35, Township 26 North, Range 54 East, and Sections 2, 3, 10, 11, 14 and 15, Township 25 North, Range 54 East, M.P.M., Richland County, Montana, for purposes of drilling a horizontal Bakken/Three Forks formation well at a location proximate to the common boundary between all of Section 34, Township 26 North, Range 54 East, and Sections 3, 10 and 15, Township 25 North, Range 54 East, & all of Section 35, Township 26 North, Range 54 East, and Sections 2, 11 and 14, Township 25 North, Range 54 East, with a heel/toe setback of 200', and providing that the OTSU shall be limited to production from the proposed horizontal well with no allocation to portions of any existing spacing unit located outside of the OTSU boundaries; and (ii) any other relief that the Board deems appropriate.

Dated this 4th day of November, 2025.

WHITE ROCK OIL & GAS, LLC

By



Uriah J. Price, Its Attorney
Crowley Fleck, PLLP
P. O. Box 10969
Bozeman, MT 59719
uprice@crowleyfleck.com

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

IN THE MATTER OF THE APPLICATION OF WHITE ROCK OIL & GAS, LLC FOR AN ORDER CREATING AN OVERLAPPING TEMPORARY SPACING UNIT ("OTSU") COMPRISED OF ALL OF SECTIONS 35 & 36, TOWNSHIP 26 NORTH, RANGE 54 EAST, AND ALL OF SECTIONS 1, 2, 11, 12, 13 & 14, TOWNSHIP 25 NORTH, RANGE 54 EAST, M.P.M., RICHLAND COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT A LOCATION PROXIMATE TO THE COMMON BOUNDARY BETWEEN THE PSU COMPRISED OF SECTION 36, TOWNSHIP 26 NORTH, RANGE 54 EAST (WITH SECTION 31, T26N-R55E), THE PSU COMPRISED OF SECTION 1, TOWNSHIP 25 NORTH, RANGE 54 EAST, THE PSU COMPRISED OF SECTION 12, TOWNSHIP 25 NORTH, RANGE 54 EAST (WITH SECTION 7, T25N-R55E), THE PSU COMPRISED OF SECTION 13, TOWNSHIP 25 NORTH, RANGE 54 EAST, & THE PSU COMPRISED OF SECTION 35, TOWNSHIP 26 NORTH, RANGE 54 EAST, THE PSU COMPRISED OF SECTION 2, TOWNSHIP 25 NORTH, RANGE 54 EAST, AND THE PSU COMPRISED OF SECTIONS 11 AND 14, TOWNSHIP 25 NORTH, RANGE 54 EAST AND ANY OTHER RELIEF THAT THE BOARD MAY DEEM APPROPRIATE.

MBOGC DOCKET NO. 394-2025

APPLICATION

WHITE ROCK OIL & GAS, LLC, 5810 TENNYSON PKWY, SUITE 500, PLANO, TX 75024:

[A] Presents the following application:

1. Applicant is an interest owner within all or portions of Sections 35 and 36, Township 26 North, Range 54 East, and Sections 1, 2, 11, 12, 13 and 14, Township 25 North, Range 54 East, M.P.M., Richland County, Montana. Section 35, Township 26 North, Range 54 East, comprise a permanent spacing unit ("PSU") formed by Board Order No. 286-2007, and White Rock Oil & Gas, LLC operates the well within the PSU. Section 36, Township 26 North, Range 54 East (with Section 31, T26N-R55E), comprise a PSU formed by Board Order No. 182-2007, and MorningStar Operating LLC operates the well within the PSU. Section 1, Township 25 North, Range 54 East, comprise a PSU formed by Board Order No. 359-2005, and MorningStar Operating LLC operates the well within the PSU. Section 2, Township 25 North, Range 54 East, comprise a PSU formed by Board Order No. 427-2006, and Continental Resources Inc. operates the well within the PSU. Sections 11 and 14, Township 25 North, Range 54 East, comprise a PSU formed by Board Order 172-2006, and White Rock Oil & Gas, LLC operates the wells within the PSU. Section 12, Township 25 North, Range 54 East (with Section 7, T25N-R55E), comprise a PSU formed by Board Order No. 391-2006, and Continental Resources Inc. operates the wells within the PSU. Section 13, Township 25 North, Range 54 East, comprise a PSU formed by Board Order No. 185-2006, and White Rock Oil & Gas, LLC operates the well within the PSU.

2. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill a horizontal Bakken/Three Forks formation well in an OTSU comprised of all of Sections 35 and 36, Township 26 North, Range 54 East, and Sections 1, 2, 11, 12, 13 and 14, Township 25 North, Range 54 East, M.P.M., Richland County, Montana. The well will be drilled at a location proximate to the common boundary between all of Section 36, Township 26 North, Range 54 East, and Sections 1,

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12 and 13, Township 25 North, Range 54 East, & all of Section 35, Township 26 North, Range 54 East, and Sections 2, 11 and 14, Township 25 North, Range 54 East, with a heel/toe setback of 200'.

3. The W½ of Section 14, Township 25 North, Range 54 East, includes federal minerals and, therefore, the MOU between the United States BLM and the Board is applicable.

4. Applicant will, within 90 days of successful completion of the proposed horizontal operation, file an application for the Board's consideration of permanent spacing and other matters relating to production from the well.

[B] Requests:

1. This matter be set for hearing, with notice given as required by law and the MOU;

2. After hearing the matter, the Board enter its order (i) creating an OTSU comprised of all of Sections 35 and 36, Township 26 North, Range 54 East, and Sections 1, 2, 11, 12, 13 and 14, Township 25 North, Range 54 East, M.P.M., Richland County, Montana, for purposes of drilling a horizontal Bakken/Three Forks formation well at a location proximate to the common boundary between all of Section 36, Township 26 North, Range 54 East, and Sections 1, 12 and 13, Township 25 North, Range 54 East, & all of Section 35, Township 26 North, Range 54 East, and Sections 2, 11 and 14, Township 25 North, Range 54 East, with a heel/toe setback of 200', and providing that the OTSU shall be limited to production from the proposed horizontal well with no allocation to portions of any existing spacing unit located outside of the OTSU boundaries; and (ii) any other relief that the Board deems appropriate.

Dated this 4th day of November, 2025.

WHITE ROCK OIL & GAS, LLC

By



Uriah J. Price, Its Attorney
Crowley Fleck, PLLP
P. O. Box 10969
Bozeman, MT 59719
uprice@crowleyfleck.com

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

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

IN THE MATTER OF THE APPLICATION OF WHITE ROCK OIL & GAS, LLC FOR AN ORDER CREATING AN OVERLAPPING TEMPORARY SPACING UNIT ("OTSU") COMPRISED OF ALL OF SECTIONS 22, 23, 26, 27, 34 & 35, TOWNSHIP 25 NORTH, RANGE 54 EAST, ALL OF SECTION 1, TOWNSHIP 24 NORTH, RANGE 54 EAST, AND ALL OF SECTION 6, TOWNSHIP 24 NORTH, RANGE 55 EAST, M.P.M., RICHLAND COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT A LOCATION PROXIMATE TO THE COMMON BOUNDARY BETWEEN THE PSU COMPRISED OF SECTION 22, TOWNSHIP 25 NORTH, RANGE 54 EAST, THE TSU COMPRISED OF SECTION 27, TOWNSHIP 25 NORTH, RANGE 54 EAST, THE PSU COMPRISED OF SECTION 34, TOWNSHIP 25 NORTH, RANGE 54 EAST AND SECTION 1, TOWNSHIP 24 NORTH, RANGE 54 EAST, & THE PSU COMPRISED OF SECTION 23, TOWNSHIP 25 NORTH, RANGE 54 EAST, THE PSU COMPRISED OF SECTION 26, TOWNSHIP 25 NORTH, RANGE 54 EAST, AND THE PSU COMPRISED OF SECTION 35, TOWNSHIP 25 NORTH, RANGE 54 EAST AND SECTION 6, TOWNSHIP 24 NORTH, RANGE 55 EAST, AND ANY OTHER RELIEF THAT THE BOARD MAY DEEM APPROPRIATE.

MBOGC DOCKET NO. 397-2025

APPLICATION

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

WHITE ROCK OIL & GAS, LLC, 5810 TENNYSON PKWY, SUITE 500, PLANO, TX 75024:

[A] Presents the following application:

1. Applicant is an interest owner within all or portions of Sections 22, 23, 26, 27, 34 and 35, Township 25 North, Range 54 East, and Section 1, Township 24 North, Range 54 East, and Section 6, Township 24 North, Range 55 East, M.P.M., Richland County, Montana. Section 23, Township 25 North, Range 54 East, comprise a permanent spacing unit ("PSU") formed by Board Order No. 255-2005, and White Rock Oil & Gas, LLC operates the well within the PSU. Section 22, Township 25 North, Range 54 East, comprise a PSU formed by Board Order No. 129-2005, and MorningStar Operating LLC operates the wells within the PSU. Section 26, Township 25 North, Range 54 East, comprise a PSU formed by Board Order No. 14-2005, and MorningStar Operating LLC operates the wells within the PSU. Section 27, Township 25 North, Range 54 East, comprise an undeveloped temporary spacing unit formed by Board Order No. 61-2025. Section 34, Township 25 North, Range 54 East, and Section 1, Township 24 North, Range 54 East, comprise a PSU formed by Board Order 306-2003, and MorningStar Operating LLC operates the wells within the PSU. Section 35, Township 25 North, Range 54 East, and Section 6, Township 24 North, Range 55 East, comprise a PSU formed by Board Order 41-2004, and White Rock Oil & Gas, LLC operates the well within the PSU.

2. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill a horizontal Bakken/Three Forks formation well in an OTSU comprised of all of Sections 22, 23, 26, 27, 34 and 35, Township 25 North, Range 54 East, and Section 1, Township 24 North, Range 54 East, and Section 6, Township 24 North, Range 55 East, M.P.M., Richland County, Montana. The well will be drilled at a location proximate to the common boundary between all of Sections 22, 27 and 34, Township 25 North, Range 54 East, and Section 1, Township 24 North, Range 54 East, & all of Sections 23, 26 and

35, Township 25 North, Range 54 East, and Section 6, Township 24 North, Range 55 East, with a heel/toe setback of 200'.

3. Lots 1-5, SE¼SW¼, S½SE¼ of Section 6 (All), Township 24 North, Range 55 East, includes federal minerals and, therefore, the MOU between the United States BLM and the Board is applicable.

4. Applicant will, within 90 days of successful completion of the proposed horizontal operation, file an application for the Board's consideration of permanent spacing and other matters relating to production from the well.

[B] Requests:

1. This matter be set for hearing, with notice given as required by law and the MOU;

2. After hearing the matter, the Board enter its order (i) creating an OTSU comprised of all of Sections 22, 23, 26, 27, 34 and 35, Township 25 North, Range 54 East, and Section 1, Township 24 North, Range 54 East, and Section 6, Township 24 North, Range 55 East, M.P.M., Richland County, Montana, for purposes of drilling a horizontal Bakken/Three Forks formation well at a location proximate to the common boundary between all of Sections 22, 27 and 34, Township 25 North, Range 54 East, and Section 1, Township 24 North, Range 54 East, & all of Sections 23, 26 and 35, Township 25 North, Range 54 East, and Section 6, Township 24 North, Range 55 East, with a heel/toe setback of 200', and providing that the OTSU shall be limited to production from the proposed horizontal well with no allocation to portions of any existing spacing unit located outside of the OTSU boundaries; and (ii) any other relief that the Board deems appropriate.

Dated this 4th day of November, 2025.

WHITE ROCK OIL & GAS, LLC

By



Uriah J. Price, Its Attorney
Crowley Fleck, PLLP
P. O. Box 10969
Bozeman, MT 59719
uprice@crowleyfleck.com

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

IN THE MATTER OF THE APPLICATION OF WHITE ROCK OIL & GAS, LLC FOR AN ORDER CREATING AN OVERLAPPING TEMPORARY SPACING UNIT ("OTSU") COMPRISED OF ALL OF SECTIONS 23, 24, 25, 26, 35 AND 36, TOWNSHIP 25 NORTH, RANGE 54 EAST, AND ALL OF SECTIONS 5 AND 6, TOWNSHIP 24 NORTH, RANGE 55 EAST, M.P.M., RICHLAND COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT A LOCATION PROXIMATE TO THE COMMON BOUNDARY BETWEEN THE PSU COMPRISED OF SECTION 24, TOWNSHIP 25 NORTH, RANGE 54 EAST, THE PSU COMPRISED OF SECTION 25, TOWNSHIP 25 NORTH, RANGE 54 EAST, AND THE PSU COMPRISED OF SECTION 36, TOWNSHIP 25 NORTH, RANGE 54 EAST AND SECTION 5, TOWNSHIP 24 NORTH, RANGE 55 EAST, & THE PSU COMPRISED OF SECTION 23, TOWNSHIP 25 NORTH, RANGE 54 EAST, THE PSU COMPRISED OF SECTION 26, TOWNSHIP 25 NORTH, RANGE 54 EAST, AND THE PSU COMPRISED OF SECTION 35, TOWNSHIP 25 NORTH, RANGE 54 EAST AND SECTION 6, TOWNSHIP 24 NORTH, RANGE 55 EAST, AND ANY OTHER RELIEF THAT THE BOARD MAY DEEM APPROPRIATE.

MBOGC DOCKET NO. 398-2025

APPLICATION

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

WHITE ROCK OIL & GAS, LLC, 5810 TENNYSON PKWY, SUITE 500, PLANO, TX 75024:

[A] Presents the following application:

1. Applicant is an interest owner within all or portions of Sections 23, 24, 25, 26, 35 and 36, Township 25 North, Range 54 East, and Sections 5 and 6, Township 24 North, Range 55 East, M.P.M., Richland County, Montana. Section 23, Township 25 North, Range 54 East, comprise a permanent spacing unit ("PSU") formed by Board Order No. 255-2005, and White Rock Oil & Gas, LLC operates the well within the PSU. Section 24, Township 25 North, Range 54 East, comprise a PSU formed by Board Order No. 13-2006, and Slawson Exploration Company Inc. operates the well within the PSU. Section 25, Township 25 North, Range 54 East, comprise a PSU formed by Board Order No. 258-2003, and MorningStar Operating LLC operates the wells within the PSU. Section 26, Township 25 North, Range 54 East, comprise a PSU formed by Board Order No. 14-2005, and MorningStar Operating LLC operates the wells within the PSU. Section 35, Township 25 North, Range 54 East, and Section 6, Township 24 North, Range 55 East, comprise a PSU formed by Board Order 41-2004, and White Rock Oil & Gas, LLC operates the well within the PSU. Section 36, Township 25 North, Range 54 East, and Section 5, Township 24 North, Range 55 East, comprise a PSU formed by Board Order 34-2010, and MorningStar Operating LLC operates the well within the PSU.

2. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill a horizontal Bakken/Three Forks formation well in an OTSU comprised of all of Sections 23, 24, 25, 26, 35 and 36, Township 25 North, Range 54 East, and Sections 5 and 6, Township 24 North, Range 55 East, M.P.M., Richland County, Montana. The well will be drilled at a location proximate to the common boundary between all of Sections 24, 25 and 36, Township 25 North, Range 54 East, and Section 5, Township 24 North, Range 55 East, & all of Sections 23, 26 and 35, Township 25 North, Range 54 East, and Section 6, Township 24 North, Range 55 East, with a heel/toe setback of 200'.

3. Lots 1-5, SE $\frac{1}{4}$ SW $\frac{1}{4}$, S $\frac{1}{2}$ SE $\frac{1}{4}$ of Section 6 (All), Township 24 North, Range 55 East, includes federal minerals and, therefore, the MOU between the United States BLM and the Board is applicable.

4. Applicant will, within 90 days of successful completion of the proposed horizontal operation, file an application for the Board's consideration of permanent spacing and other matters relating to production from the well.

[B] Requests:

1. This matter be set for hearing, with notice given as required by law and the MOU;

2. After hearing the matter, the Board enter its order (i) creating an OTSU comprised of all of Sections 23, 24, 25, 26, 35 and 36, Township 25 North, Range 54 East, and Sections 5 and 6, Township 24 North, Range 55 East, M.P.M., Richland County, Montana, for purposes of drilling a horizontal Bakken/Three Forks formation well at a location proximate to the common boundary between all of Sections 24, 25 and 36, Township 25 North, Range 54 East, and Section 5, Township 24 North, Range 55 East, & all of Sections 23, 26 and 35, Township 25 North, Range 54 East, and Section 6, Township 24 North, Range 55 East, with a heel/toe setback of 200', and providing that the OTSU shall be limited to production from the proposed horizontal well with no allocation to portions of any existing spacing unit located outside of the OTSU boundaries; and (ii) any other relief that the Board deems appropriate.

Dated this 4th day of November, 2025.

WHITE ROCK OIL & GAS, LLC

By



Umah J. Price, Its Attorney
Crowley Fleck, PLLP
P. O. Box 10969
Bozeman, MT 59719
uprice@crowleyfleck.com

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

IN THE MATTER OF THE APPLICATION OF MORNINGSTAR OPERATING LLC FOR AN ORDER CREATING AN OVERLAPPING TEMPORARY SPACING UNIT ("OTSU") COMPRISED OF ALL OF SECTIONS 11, 14 & 23, TOWNSHIP 22 NORTH, RANGE 59 EAST, M.P.M., RICHLAND COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT ANY LOCATION NOT CLOSER THAN 200' (HEEL TOE SETBACK) / 660' (LATERAL SETBACK) TO THE BOUNDARIES OF THE OTSU, CLARIFYING BOARD ORDER NOS. 24-2011 & 207-2004, VACATING BOARD ORDER NO. 10-2010, AND ANY OTHER RELIEF THAT THE BOARD MAY DEEM APPROPRIATE.

MBOGC DOCKET NO. 399-2025

APPLICATION

MORNINGSTAR OPERATING LLC, 400 W 7TH ST., FORT WORTH, TX 76102:

[A] Presents the following application:

1. Applicant is an interest owner within all or portions of Sections 11, 14 and 23, Township 22 North, Range 59 East, M.P.M., Richland County, Montana. All of Section 11 (along with all of Section 10), Township 22 North, Range 59 East, is subject to Board Orders 295-2008 (PSU), 24-2011 (pooling), 148-2009 (inc. density) and 10-2010 (2nd inc. density), and MorningStar Operating LLC operates the Patricia 41X-15 and Thiel 11X-12 wells located in the pooled spacing unit comprised of Sections 10 & 11. All of Sections 14 and 23, Township 22 North, Range 59 East, are subject to Board Orders 206-2004 (PSU), 207-2004 (pooling) and 304-2005 (inc. density), and MorningStar Operating LLC operates the Rau 31X-23 and Jerry 41X-15 wells located in the pooled spacing unit comprised of Sections 14 & 23.

2. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill a horizontal Bakken/Three Forks formation well at a location within, but not closer than 200' (heel toe setback) / 660' (lateral setback) to the exterior boundaries of, an OTSU comprised of Sections 11, 14 and 23, Township 22 North, Range 59 East, M.P.M., Richland County, Montana. To preserve correlative rights of all interest owners in Sections 11 & 10, Township 22 North, Range 59 East, Board Order 24-2011 should be amended to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the Patricia 41X-15 and Thiel 11X-12 wells. We are also asking the Board to vacate Board Order 10-2010, a second increased density order for the permanent spacing unit. To preserve correlative rights of all interest owners in Sections 14 & 23, Township 22 North, Range 59 East, Board Order 207-2004 should be amended to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the Rau 31X-23 and Jerry 41X-15 wells.

3. Lot 8 of Section 10, Township 22 North, Range 59 East, includes federal minerals and, therefore, the MOU between the United States BLM and the Board is applicable.

4. Applicant will, within 90 days of successful completion of the proposed horizontal operation, file an application for the Board's consideration of permanent spacing and other matters relating to production from the well.

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MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

[B] Requests:

1. This matter be set for hearing, with notice given as required by law and the MOU;

2. After hearing the matter, the Board enter its order **(i)** creating an OTSU comprised of all of Sections 11, 14 and 23, Township 22 North, Range 59 East, M.P.M., Richland County, Montana, and authorizing the drilling of a horizontal Bakken/Three Forks formation well at any location within such OTSU but not closer than 200' (heel toe setback) / 660' (lateral setback) to the exterior boundaries thereof; **(ii)** amending Board Order 24-2011 to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the Patricia 41X-15 and Thiel 11X-12 wells; **(iii)** amending Board Order 207-2004 to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the Rau 31X-23 and Jerry 41X-15 wells; **(iv)** vacating Board Order 10-2010; and **(v)** any other relief as the Board may deem appropriate.

Dated this 5th day of November, 2025.

MORNINGSTAR OPERATING LLC

By



Uriah J. Price, Its Attorney
Crowley Fleck, PLLP
P. O. Box 10969
Bozeman, MT 59719
uprice@crowleyfleck.com

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

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

IN THE MATTER OF THE APPLICATION OF MORNINGSTAR OPERATING LLC FOR AN ORDER CREATING AN OVERLAPPING TEMPORARY SPACING UNIT ("OTSU") COMPRISED OF ALL OF SECTIONS 10, 15 & 22, TOWNSHIP 22 NORTH, RANGE 59 EAST, M.P.M., RICHLAND COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT ANY LOCATION NOT CLOSER THAN 200' (HEEL TOE SETBACK) / 660' (LATERAL SETBACK) TO THE BOUNDARIES OF THE OTSU, CLARIFYING BOARD ORDER NOS. 24-2011, 109-2008 & 316-2010, VACATING BOARD ORDER NO. 10-2010, AND ANY OTHER RELIEF THAT THE BOARD MAY DEEM APPROPRIATE.

MBOGC DOCKET NO. 400-2025

APPLICATION

MORNINGSTAR OPERATING LLC, 400 W 7TH ST., FORT WORTH, TX 76102:

[A] Presents the following application:

1. Applicant is an interest owner within all or portions of Sections 10, 15 and 22, Township 22 North, Range 59 East, M.P.M., Richland County, Montana. All of Section 10 (along with all of Section 11), Township 22 North, Range 59 East, is subject to Board Orders 295-2008 (PSU), 24-2011 (pooling), 148-2009 (inc. density) and 10-2010 (2nd inc. density), and MorningStar Operating LLC operates the Patricia 41X-15 and Thiel 11X-12 wells located in the pooled spacing unit comprised of Sections 10 & 11. All of Sections 15 and 22, Township 22 North, Range 59 East, are subject to Board Orders 92-2006 (PSU), 109-2008 (pooling for Rau well), 316-2010 (pooling for the Lone well) and 150-2009 (inc. density), and MorningStar Operating LLC operates the Rau 41X-15 and Lone 24X-22 wells located in the pooled spacing unit comprised of Sections 15 & 22.

2. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill a horizontal Bakken/Three Forks formation well at a location within, but not closer than 200' (heel toe setback) / 660' (lateral setback) to the exterior boundaries of, an OTSU comprised of Sections 10, 15 and 22, Township 22 North, Range 59 East, M.P.M., Richland County, Montana. To preserve correlative rights of all interest owners in Sections 10 & 11, Township 22 North, Range 59 East, Board Order 24-2011 should be amended to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the Patricia 41X-15 and Thiel 11X-12 wells. We are also asking the Board to vacate Board Order 10-2010, a second increased density order for the permanent spacing unit. To preserve correlative rights of all interest owners in Sections 15 & 22, Township 22 North, Range 59 East, Board Order 109-2008 should be amended to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the Rau 41X-15 well; and Board Order 316-2010 should be amended to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the Lone 24X-22 well.

3. Lot 8 of Section 10, and the NE¼ of Section 22, Township 22 North, Range 59 East, include federal minerals and, therefore, the MOU between the United States BLM and the Board is applicable.

4. Applicant will, within 90 days of successful completion of the proposed horizontal operation, file an application for the Board's consideration of permanent spacing and other matters relating to production from the well.

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[B] Requests:

1. This matter be set for hearing, with notice given as required by law and the MOU;

2. After hearing the matter, the Board enter its order **(i)** creating an OTSU comprised of all of Sections 10, 15 and 22, Township 22 North, Range 59 East, M.P.M., Richland County, Montana, and authorizing the drilling of a horizontal Bakken/Three Forks formation well at any location within such OTSU but not closer than 200' (heel toe setback) / 660' (lateral setback) to the exterior boundaries thereof; **(ii)** amending Board Order 24-2011 to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the Patricia 41X-15 and Thiel 11X-12 wells; **(iii)** amending Board Order 109-2008 to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the Rau 41X-15 well; **(iv)** amending Board Order 316-2010 to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the Ione 24X-22 well; and **(v)** any other relief as the Board may deem appropriate.

Dated this 5th day of November, 2025.

MORNINGSTAR OPERATING LLC

By _____



Uriah J. Price, Its Attorney
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P. O. Box 10969
Bozeman, MT 59719
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NOV 06 2025

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

IN THE MATTER OF THE APPLICATION OF MORNINGSTAR OPERATING LLC FOR AN ORDER CREATING AN OVERLAPPING TEMPORARY SPACING UNIT ("OTSU") COMPRISED OF ALL OF SECTIONS 10, 11, 14, 15, 22 & 23, TOWNSHIP 22 NORTH, RANGE 59 EAST, M.P.M., RICHLAND COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT A LOCATION PROXIMATE TO THE COMMON BOUNDARY BETWEEN THE PROPOSED OVERLAPPING TEMPORARY SPACING UNIT COMPRISED OF SECTIONS 10, 15 AND 22, TOWNSHIP 22 NORTH, RANGE 59 EAST, AND THE PROPOSED OVERLAPPING TEMPORARY SPACING UNIT COMPRISED OF SECTIONS 11, 14 AND 23, TOWNSHIP 22 NORTH, RANGE 59 EAST, AND ANY OTHER RELIEF THAT THE BOARD MAY DEEM APPROPRIATE.

MBOGC DOCKET NO. 401-2025

APPLICATION

MORNINGSTAR OPERATING LLC, 400 W 7TH ST., FORT WORTH, TX 76102:

[A] Presents the following application:

1. Applicant is an interest owner within all or portions of Sections 10, 11, 14, 15, 22 and 23, Township 22 North, Range 59 East, M.P.M., Richland County, Montana. It is anticipated that all of Sections 10, 15 and 22, Township 22 North, Range 59 East, will comprise an overlapping temporary spacing unit ("OTSU") for purposes of Bakken/Three Forks formation production pursuant to Board Order ____-2025. In addition, it is anticipated that all of Sections 11, 14 and 23, Township 22 North, Range 59 East, will comprise an overlapping temporary spacing unit ("OTSU") for purposes of Bakken/Three Forks formation production pursuant to Board Order ____-2025.

2. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill a horizontal Bakken/Three Forks formation well in an OTSU comprised of all of Sections 10, 11, 14, 15, 22 and 23, Township 22 North, Range 59 East, M.P.M., Richland County, Montana. The well will be drilled at a location proximate to the common boundary between all of Sections 10, 15 and 22, Township 22 North, Range 59 East, and all of Sections 11, 14 and 23, Township 22 North, Range 59 East, with a heel/toe setback of 200'.

3. Lot 8 of Section 10, and the NE¼ of Section 22, Township 22 North, Range 59 East, include federal minerals and, therefore, the MOU between the United States BLM and the Board is applicable.

4. Applicant will, within 90 days of successful completion of the proposed horizontal operation, file an application for the Board's consideration of permanent spacing and other matters relating to production from the well.

[B] Requests:

1. This matter be set for hearing, with notice given as required by law and the MOU;

2. After hearing the matter, the Board enter its order (i) creating an OTSU comprised of all of Sections 10, 11, 14, 15, 22 and 23, Township 22 North, Range 59 East, M.P.M., Richland County, Montana, for purposes of


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drilling a horizontal Bakken/Three Forks formation well at a location proximate to the common boundary between all of Sections 10, 15 and 22, Township 22 North, Range 59 East, and all of Sections 11, 14 and 23, Township 22 North, Range 59 East, with a heel/toe setback of 200', and providing that the OTSU shall be limited to production from the proposed horizontal well with no allocation to portions of any existing spacing unit located outside of the OTSU boundaries; and (ii) any other relief that the Board deems appropriate.

Dated this 5th day of November, 2025.

MORNINGSTAR OPERATING LLC

By 
Uriah J. Price, Its Attorney
Crowley Fleck, PLLP
P. O. Box 10969
Bozeman, MT 59719
uprice@crowleyfleck.com

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

IN THE MATTER OF THE APPLICATION OF MORNINGSTAR OPERATING LLC FOR AN ORDER CREATING AN OVERLAPPING TEMPORARY SPACING UNIT ("OTSU") COMPRISED OF ALL OF SECTIONS 15, 22 & 27, TOWNSHIP 25 NORTH, RANGE 54 EAST, M.P.M., RICHLAND COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT ANY LOCATION NOT CLOSER THAN 200' (HEEL TOE SETBACK) / 660' (LATERAL SETBACK) TO THE BOUNDARIES OF THE OTSU, CLARIFYING BOARD ORDER NOS. 259-2006 & 130-2005, CLARIFYING THE STATEWIDE SPACING UNIT COMPRISED OF THE SE¼ OF SECTION 27, AMENDING ORDER 62-2025, VACATING BOARD ORDER NOS. 61-2025 & 26-1995, AND ANY OTHER RELIEF THAT THE BOARD MAY DEEM APPROPRIATE.

MBOGC DOCKET NO. 402-2025

APPLICATION

MORNINGSTAR OPERATING LLC, 400 W 7TH ST., FORT WORTH, TX 76102:

[A] Presents the following application:

1. Applicant is an interest owner within all or portions of Sections 15, 22 and 27, Township 25 North, Range 54 East, M.P.M., Richland County, Montana. All of Section 15, Township 25 North, Range 54 East, is subject to Board Orders 259-2006 (PSU) and 62-2025 (inc. density), and MorningStar Operating LLC operates the Vaira 11X-15 well located in the pooled spacing unit comprised of Section 15. All of Section 22, Township 25 North, Range 54 East, is subject to Board Orders 129-2005 (PSU), 130-2005 (pooling) and 357-2005 (inc. density), and MorningStar Operating LLC operates the Hoefle 1-22H and Hoefle 2-22H wells located in the pooled spacing unit comprised of Section 22. All of Section 27, Township 25 North, Range 54 East, is subject to Board Order 61-2025 (OTSU). In addition, the W½ of Section 27 was formerly spaced under Board Order No. 26-1995; the well within such spacing unit, the Strand 22-27H, has been plugged and abandoned. The SE¼ of Section 27 is a statewide spacing unit for a vertical Bakken Well. The BN 9-27 vertical well is located on the SE¼ of Section 27, is operated by Genesis ST Operating LLC, and last reported production November 2014.

2. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill a horizontal Bakken/Three Forks formation well at a location within, but not closer than 200' (heel toe setback) / 660' (lateral setback) to the exterior boundaries of, an OTSU comprised of Sections 15, 22 and 27, Township 25 North, Range 54 East, M.P.M., Richland County, Montana. To preserve correlative rights of all interest owners in Section 15, Township 25 North, Range 54 East, Board Order 259-2006 should be amended to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the Vaira 11X-15 well. We are also asking the Board to amend Board Order 62-2025 but only insofar as necessary to vacate the authorization for an increased density well in Section 15. To preserve correlative rights of all interest owners in Section 22, Township 25 North, Range 54 East, Board Order 130-2005 should be amended to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the Hoefle 1-22H and Hoefle 2-22H wells. To preserve correlative rights of all interest owners in the SE¼ of Section 27, we ask the Board to clarify that any oil and associated natural gas produced from the Bakken/Three Forks formation from the BN 9-27 vertical well be limited to the owners in the SE¼ of Section 27, Township 25 North, Range 54 East, M.P.M. Further, because the Strand 22-27H well has been

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plugged and abandoned, we ask the Board to vacate Order No. 26-1995. It will also be necessary to vacate Board Order 61-2025, the undeveloped OTSU comprised of Section 27.

3. The E½ of Section 15, Township 25 North, Range 54 East, includes federal minerals and, therefore, the MOU between the United States BLM and the Board is applicable.

4. Applicant will, within 90 days of successful completion of the proposed horizontal operation, file an application for the Board's consideration of permanent spacing and other matters relating to production from the well.

[B] Requests:

1. This matter be set for hearing, with notice given as required by law and the MOU;

2. After hearing the matter, the Board enter its order (i) creating an OTSU comprised of all of Sections 15, 22 and 27, Township 25 North, Range 54 East, M.P.M., Richland County, Montana, and authorizing the drilling of a horizontal Bakken/Three Forks formation well at any location within such OTSU but not closer than 200' (heel toe setback) / 660' (lateral setback) to the exterior boundaries thereof; (ii) amending Board Order 259-2006 to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the Vaira 11X-15 well; (iii) amending Board Order 130-2005 to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the Hoefle 1-22H and Hoefle 2-22H wells; (iv) clarifying that any oil and associated natural gas produced from the Bakken/Three Forks formation from the BN 9-27 vertical well be limited to the owners in the SE¼ of Section 27, Township 25 North, Range 54 East; (v) amending Board Order No. 62-2025 to eliminate the authorization for an increased density well in Section 15; (vi) vacating Board Order Nos. 26-1995 and 61-2025; and (vii) any other relief as the Board may deem appropriate.

Dated this 5th day of November, 2025.

MORNINGSTAR OPERATING LLC

By



Uriah J. Price, Its Attorney
Crowley Fleck, PLLP
P. O. Box 10969
Bozeman, MT 59719
uprice@crowleyfleck.com

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

IN THE MATTER OF THE APPLICATION OF MORNINGSTAR OPERATING LLC FOR AN ORDER CREATING AN OVERLAPPING TEMPORARY SPACING UNIT ("OTSU") COMPRISED OF ALL OF SECTIONS 15, 16, 21, 22, 27 & 28, TOWNSHIP 25 NORTH, RANGE 54 EAST, M.P.M., RICHLAND COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT A LOCATION PROXIMATE TO THE COMMON BOUNDARY BETWEEN THE PROPOSED OVERLAPPING TEMPORARY SPACING UNIT COMPRISED OF SECTIONS 15, 22 AND 27, TOWNSHIP 25 NORTH, RANGE 54 EAST, & THE PSU COMPRISED OF SECTION 16 (WITH SECTION 17), TOWNSHIP 25 NORTH, RANGE 54 EAST, THE PSU COMPRISED OF SECTION 21, TOWNSHIP 25 NORTH, RANGE 54 EAST, AND THE PSU COMPRISED OF SECTION 28, TOWNSHIP 25 NORTH, RANGE 54 EAST, AND ANY OTHER RELIEF THAT THE BOARD MAY DEEM APPROPRIATE.

MBOGC DOCKET NO. 403-2025

APPLICATION

MORNINGSTAR OPERATING LLC, 400 W 7TH ST., FORT WORTH, TX 76102:

[A] Presents the following application:

1. Applicant is an interest owner within all or portions of Sections 15, 16, 21, 22, 27 and 28, Township 25 North, Range 54 East, M.P.M., Richland County, Montana. It is anticipated that all of Sections 15, 22 and 27, Township 25 North, Range 54 East, will comprise an overlapping temporary spacing unit for purposes of Bakken/Three Forks formation production pursuant to Board Order ____-2025. Section 16 (with Section 17), Township 25 North, Range 54 East comprise a permanent spacing unit ("PSU") formed by Board Order 74-2005, and MorningStar Operating LLC operates the wells within the PSU. Section 21, Township 25 North, Range 54 East, comprise a PSU formed by Board Order No. 247-2004, and MorningStar Operating LLC operates the wells within the PSU. Section 28, Township 25 North, Range 54 East, comprise a PSU formed by Board Order No. 105-2003, and MorningStar Operating LLC operates the wells within the PSU.

2. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill a horizontal Bakken/Three Forks formation well in an OTSU comprised of all of Sections 15, 16, 21, 22, 27 and 28, Township 25 North, Range 54 East, M.P.M., Richland County, Montana. The well will be drilled at a location proximate to the common boundary between all of Sections 15, 22 and 27, Township 25 North, Range 54 East, and all of Sections 16, 21 and 28, Township 25 North, Range 54 East, with a heel/toe setback of 200'.

3. The E½ of Section 15, Township 25 North, Range 54 East, includes federal minerals and, therefore, the MOU between the United States BLM and the Board is applicable.

4. Applicant will, within 90 days of successful completion of the proposed horizontal operation, file an application for the Board's consideration of permanent spacing and other matters relating to production from the well.

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MONTANA BOARD OF OIL &
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[B] Requests:

1. This matter be set for hearing, with notice given as required by law and the MOU;

2. After hearing the matter, the Board enter its order **(i)** creating an OTSU comprised of all of Sections 15, 16, 21, 22, 27 and 28, Township 25 North, Range 54 East, M.P.M., Richland County, Montana, for purposes of drilling a horizontal Bakken/Three Forks formation well at a location proximate to the common boundary between all of Sections 15, 22 and 27, Township 25 North, Range 54 East, and all Sections 16, 21 and 28, Township 25 North, Range 54 East, with a heel/toe setback of 200', and providing that the OTSU shall be limited to production from the proposed horizontal well with no allocation to portions of any existing spacing unit located outside of the OTSU boundaries; and **(ii)** any other relief that the Board deems appropriate.

Dated this 5th day of November, 2025.

MORNINGSTAR OPERATING LLC

By  _____
Urjah J. Price, Its Attorney
Crowley Fleck, PLLP
P. O. Box 10969
Bozeman, MT 59719
uprice@crowleyfleck.com

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

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

IN THE MATTER OF THE APPLICATION OF MORNINGSTAR OPERATING LLC FOR AN ORDER CREATING AN OVERLAPPING TEMPORARY SPACING UNIT ("OTSU") COMPRISED OF ALL OF SECTIONS 14, 15, 22, 23, 26 & 27, TOWNSHIP 25 NORTH, RANGE 54 EAST, M.P.M., RICHLAND COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT A LOCATION PROXIMATE TO THE COMMON BOUNDARY BETWEEN THE PROPOSED OVERLAPPING TEMPORARY SPACING UNIT COMPRISED OF SECTIONS 15, 22 AND 27, TOWNSHIP 25 NORTH, RANGE 54 EAST, & THE PSU COMPRISED OF SECTION 14 (WITH SECTION 11), TOWNSHIP 25 NORTH, RANGE 54 EAST, THE PSU COMPRISED OF SECTION 23, TOWNSHIP 25 NORTH, RANGE 54 EAST, AND THE PSU COMPRISED OF SECTION 26, TOWNSHIP 25 NORTH, RANGE 54 EAST, AND ANY OTHER RELIEF THAT THE BOARD MAY DEEM APPROPRIATE.

MBOGC DOCKET NO. 404-2025
APPLICATION

MORNINGSTAR OPERATING LLC, 400 W 7TH ST., FORT WORTH, TX 76102:

[A] Presents the following application:

1. Applicant is an interest owner within all or portions of Sections 14, 15, 22, 23, 26 and 27, Township 25 North, Range 54 East, M.P.M., Richland County, Montana. It is anticipated that all of Sections 15, 22 and 27, Township 25 North, Range 54 East, will comprise an overlapping temporary spacing unit for purposes of Bakken/Three Forks formation production pursuant to Board Order ____-2025. Section 14 (with Section 11), Township 25 North, Range 54 East, comprise a permanent spacing unit ("PSU") formed by Board Order 172-2006, and White Rock Oil & Gas, LLC operates the wells within the PSU. Section 23, Township 25 North, Range 54 East, comprise a PSU formed by Board Order No. 255-2005, and White Rock Oil & Gas, LLC operates the well within the PSU. Section 26, Township 25 North, Range 54 East, comprise a PSU formed by Board Order No. 14-2005, and MorningStar Operating LLC operates the wells within the PSU.

2. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill a horizontal Bakken/Three Forks formation well in an OTSU comprised of all of Sections 14, 15, 22, 23, 26 and 27, Township 25 North, Range 54 East, M.P.M., Richland County, Montana. The well will be drilled at a location proximate to the common boundary between all of Sections 15, 22 and 27, Township 25 North, Range 54 East, and all of Sections 14, 23 and 26, Township 25 North, Range 54 East, with a heel/toe setback of 200'.

3. The E½ of Section 15 and the W½ of Section 14, Township 25 North, Range 54 East, includes federal minerals and, therefore, the MOU between the United States BLM and the Board is applicable.

4. Applicant will, within 90 days of successful completion of the proposed horizontal operation, file an application for the Board's consideration of permanent spacing and other matters relating to production from the well.

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MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS


[B] Requests:

1. This matter be set for hearing, with notice given as required by law and the MOU;

2. After hearing the matter, the Board enter its order (i) creating an OTSU comprised of all of Sections 14, 15, 22, 23, 26 and 27, Township 25 North, Range 54 East, M.P.M., Richland County, Montana, for purposes of drilling a horizontal Bakken/Three Forks formation well at a location proximate to the common boundary between all of Sections 15, 22 and 27, Township 25 North, Range 54 East, and all of Sections 14, 23 and 26, Township 25 North, Range 54 East, with a heel/toe setback of 200', and providing that the OTSU shall be limited to production from the proposed horizontal well with no allocation to portions of any existing spacing unit located outside of the OTSU boundaries; and (ii) any other relief that the Board deems appropriate.

Dated this 5th day of November, 2025.

MORNINGSTAR OPERATING LLC

By  _____
Uriah J. Price, Its Attorney
Crowley Fleck, PLLP
P. O. Box 10969
Bozeman, MT 59719
uprice@crowleyfleck.com

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

IN THE MATTER OF THE APPLICATION OF MORNINGSTAR OPERATING LLC FOR AN ORDER CREATING AN OVERLAPPING TEMPORARY SPACING UNIT ("OTSU") COMPRISED OF ALL OF SECTION 36, TOWNSHIP 25 NORTH, RANGE 55 EAST, M.P.M., AND ALL OF SECTIONS 5 AND 8, TOWNSHIP 24 NORTH, RANGE 56 EAST, M.P.M., RICHLAND COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT ANY LOCATION NOT CLOSER THAN 200' (HEEL TOE SETBACK) / 660' (LATERAL SETBACK) TO THE BOUNDARIES OF THE OTSU, CLARIFYING BOARD ORDER NOS. 487-2005 & 45-2004, VACATING BOARD ORDER NO. 77-2008, AND ANY OTHER RELIEF THAT THE BOARD MAY DEEM APPROPRIATE.

MBOGC DOCKET NO. 405-2025

APPLICATION

MORNINGSTAR OPERATING LLC, 400 W 7TH ST., FORT WORTH, TX 76102:

[A] Presents the following application:

1. Applicant is an interest owner within all or portions of Section 36, Township 25 North, Range 55 East, M.P.M., and Sections 5 and 8, Township 24 North, Range 56 East, M.P.M., Richland County, Montana. All of Section 36, Township 25 North, Range 55 East, (along with Section 31, T25N-R56E) is subject to Board Order 487-2005 (PSU), and MorningStar Operating LLC operates the Richland State 11X-31 well located in the pooled spacing unit comprised of Section 36, Township 25 North, Range 55 East and Section 31, Township 25 North, Range 56 East. All of Sections 5 and 8, Township 24 North, Range 56 East, are subject to Board Orders 45-2004 (PSU) and 77-2008 (inc. density), and MorningStar Operating LLC operates the BR 33X-5 well located in the pooled spacing unit comprised of Sections 5 and 8.

2. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill a horizontal Bakken/Three Forks formation well at a location within, but not closer than 200' (heel toe setback) / 660' (lateral setback) to the exterior boundaries of, an OTSU comprised of Section 36, Township 25 North, Range 55 East, M.P.M., and Sections 5 and 8, Township 24 North, Range 56 East, M.P.M., Richland County, Montana. To preserve correlative rights of all interest owners in Section 36, Township 25 North, Range 55 East and Section 31, Township 25 North, Range 56 East, Board Order 487-2005 should be amended to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the Richland State 11X-31 well. To preserve correlative rights of all interest owners in Sections 5 and 8, Township 24 North, Range 56 East, Board Order 45-2004 should be amended to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the BR 33X-5 well. It will also be necessary to vacate Board Order 77-2008, the increased density orders for Sections 5 and 8.

3. Applicant will, within 90 days of successful completion of the proposed horizontal operation, file an application for the Board's consideration of permanent spacing and other matters relating to production from the well.

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

[B] Requests:

1. This matter be set for hearing, with notice given as required by law and the MOU;

2. After hearing the matter, the Board enter its order **(i)** creating an OTSU comprised of all of Section 36, Township 25 North, Range 55 East, M.P.M., and Sections 5 and 8, Township 24 North, Range 56 East, M.P.M., Richland County, Montana, and authorizing the drilling of a horizontal Bakken/Three Forks formation well at any location within such OTSU but not closer than 200' (heel toe setback) / 660' (lateral setback) to the exterior boundaries thereof; **(ii)** amending Board Order 487-2005 to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the Richland State 11X-31 well; **(iii)** amending Board Order 45-2004 to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the BR 33X-5 well; **(iv)** vacating Board Order 77-2008; and **(v)** any other relief as the Board may deem appropriate.

Dated this 5th day of November, 2025.

MORNINGSTAR OPERATING LLC

By



Uriah J. Price, Its Attorney
Crowley Fleck, PLLP
P. O. Box 10969
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MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

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

IN THE MATTER OF THE APPLICATION OF MORNINGSTAR OPERATING LLC FOR AN ORDER AUTHORIZING THE DRILLING OF ONE (1) ADDITIONAL HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL IN THE OVERLAPPING TEMPORARY SPACING UNIT ("OTSU") COMPRISED OF ALL OF SECTION 36, TOWNSHIP 25 NORTH, RANGE 55 EAST, M.P.M., AND ALL OF SECTIONS 5 AND 8, TOWNSHIP 24 NORTH, RANGE 56 EAST, M.P.M., RICHLAND COUNTY, MONTANA, AT ANY LOCATION NOT CLOSER THAN 200' (HEEL TOE SETBACK) / 660' (LATERAL SETBACK) TO THE BOUNDARIES OF THE OTSU, AND ANY OTHER RELIEF THAT THE BOARD MAY DEEM APPROPRIATE.

MBOGC DOCKET NO. 406-2025

APPLICATION

MORNINGSTAR OPERATING LLC, 400 W 7TH ST., FORT WORTH, TX 76102:

[A] Presents the following application:

1. Applicant is an interest owner within all or portions of Section 36, Township 25 North, Range 55 East, M.P.M., and Sections 5 and 8, Township 24 North, Range 56 East, M.P.M., Richland County, Montana. It is anticipated that such lands will comprise an OTSU for purposes of Bakken/Three Forks formation pursuant to Montana Board of Oil and Gas Conservation No. ____-2025.

2. Applicant requests authority to drill one (1) additional horizontal Bakken/Three Forks formation well within the OTSU, at any location not closer than 200' (heel toe setback) / 660' (lateral setback) to the exterior boundaries thereof, if in its judgment as operator of the OTSU such operations appear reasonable and prudent.

[B] Requests:

1. This matter be set for hearing, with notice given as required by law and the MOU;

2. After hearing the matter, the Board enter its order authorizing the Applicant to drill one (1) additional horizontal Bakken/Three Forks formation well at any location within, but not closer than 200' (heel toe setback) / 660' (lateral setback) to the exterior boundaries of, the OTSU comprised of all of Section 36, Township 25 North, Range 55 East, M.P.M., and all of Sections 5 and 8, Township 24 North, Range 56 East, M.P.M., Richland County, Montana, and such other and further relief as the Board may deem appropriate.

Dated this 5th day of November, 2025.

MORNINGSTAR OPERATING LLC

By



Urjah J. Price, Its Attorney
Crowley Fleck, PLLP
P. O. Box 10969
Bozeman, MT 59719
uprice@crowleyfleck.com

RECEIVED

NOV 06 2025

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

IN THE MATTER OF THE APPLICATION OF MORNINGSTAR OPERATING LLC FOR AN ORDER CREATING AN OVERLAPPING TEMPORARY SPACING UNIT ("OTSU") COMPRISED OF ALL OF SECTION 31, TOWNSHIP 25 NORTH, RANGE 56 EAST, M.P.M., AND ALL OF SECTIONS 4 AND 9, TOWNSHIP 24 NORTH, RANGE 56 EAST, M.P.M., RICHLAND COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT ANY LOCATION NOT CLOSER THAN 200' (HEEL TOE SETBACK) / 660' (LATERAL SETBACK) TO THE BOUNDARIES OF THE OTSU, CLARIFYING BOARD ORDER NOS. 487-2005 & 169-2004, VACATING BOARD ORDER NO. 105-2008, AND ANY OTHER RELIEF THAT THE BOARD MAY DEEM APPROPRIATE.

MBOGC DOCKET NO. 407-2025

APPLICATION

MORNINGSTAR OPERATING LLC, 400 W 7TH ST., FORT WORTH, TX 76102:

[A] Presents the following application:

1. Applicant is an interest owner within all or portions of Section 31, Township 25 North, Range 56 East, M.P.M., and Sections 4 and 9, Township 24 North, Range 56 East, M.P.M., Richland County, Montana. All of Section 31, Township 25 North, Range 56 East, (along with Section 36, T25N-R55E) is subject to Board Order 487-2005 (PSU), and MorningStar Operating LLC operates the Richland State 11X-31 well located in the pooled spacing unit comprised of Section 36, Township 25 North, Range 55 East and Section 31, Township 25 North, Range 56 East. All of Sections 4 and 9, Township 24 North, Range 56 East, are subject to Board Orders 169-2004 (PSU) and 105-2008 (inc. density), and MorningStar Operating LLC operates the Johnson 34X-9 well located in the pooled spacing unit comprised of Sections 4 and 9.

2. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill a horizontal Bakken/Three Forks formation well at a location within, but not closer than 200' (heel toe setback) / 660' (lateral setback) to the exterior boundaries of, an OTSU comprised of Section 31, Township 25 North, Range 56 East, M.P.M., and Sections 4 and 9, Township 24 North, Range 56 East, M.P.M., Richland County, Montana. To preserve correlative rights of all interest owners in Section 36, Township 25 North, Range 55 East and Section 31, Township 25 North, Range 56 East, Board Order 487-2005 should be amended to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the Richland State 11X-31 well. To preserve correlative rights of all interest owners in Sections 4 and 9, Township 24 North, Range 56 East, Board Order 169-2004 should be amended to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the Johnson 34X-9 well. It will also be necessary to vacate Board Order 105-2008, the increased density orders for Sections 4 and 9.

3. Applicant will, within 90 days of successful completion of the proposed horizontal operation, file an application for the Board's consideration of permanent spacing and other matters relating to production from the well.

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[B] Requests:

1. This matter be set for hearing, with notice given as required by law and the MOU;

2. After hearing the matter, the Board enter its order **(i)** creating an OTSU comprised of all of Section 31, Township 25 North, Range 56 East, M.P.M., and Sections 4 and 9, Township 24 North, Range 56 East, M.P.M., Richland County, Montana, and authorizing the drilling of a horizontal Bakken/Three Forks formation well at any location within such OTSU but not closer than 200' (heel toe setback) / 660' (lateral setback) to the exterior boundaries thereof; **(ii)** amending Board Order 487-2005 to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the Richland State 11X-31 well; **(iii)** amending Board Order 169-2004 to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the Johnson 34X-9 well; **(iv)** vacating Board Order 105-2008; and **(v)** any other relief as the Board may deem appropriate.

Dated this 5th day of November, 2025.

MORNINGSTAR OPERATING LLC

By



Uriah J. Price, Its Attorney
Crowley Fleck, PLLP
P. O. Box 10969
Bozeman, MT 59719
uprice@crowleyfleck.com

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NOV 06 2025

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

IN THE MATTER OF THE APPLICATION OF MORNINGSTAR OPERATING LLC FOR AN ORDER CREATING AN OVERLAPPING TEMPORARY SPACING UNIT ("OTSU") COMPRISED OF ALL OF SECTIONS 34 & 35 TOWNSHIP 25 NORTH, RANGE 54 EAST, ALL OF SECTIONS 1 & 12 TOWNSHIP 24 NORTH, RANGE 54 EAST, AND ALL OF SECTIONS 6 & 7 TOWNSHIP 24 NORTH, RANGE 55 EAST, M.P.M., RICHLAND COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT A LOCATION PROXIMATE TO THE COMMON BOUNDARY BETWEEN THE PSU COMPRISED OF SECTION 34 TOWNSHIP 25 NORTH, RANGE 54 EAST, & SECTION 1, TOWNSHIP 24 NORTH, RANGE 54 EAST, THE PSU COMPRISED OF SECTION 12 (WITH SECTION 13), TOWNSHIP 24 NORTH, RANGE 54 EAST, & THE PSU COMPRISED OF SECTION 35 TOWNSHIP 25 NORTH, RANGE 54 EAST, & SECTION 6, TOWNSHIP 24 NORTH, RANGE 55 EAST, AND THE PSU COMPRISED OF SECTION 7, TOWNSHIP 24 NORTH, RANGE 55 EAST, AND ANY OTHER RELIEF THAT THE BOARD MAY DEEM APPROPRIATE.

MBOGC DOCKET NO. 408-2025

APPLICATION

MORNINGSTAR OPERATING LLC, 400 W 7TH ST., FORT WORTH, TX 76102:

[A] Presents the following application:

1. Applicant is an interest owner within all or portions of Sections 34 and 35, Township 25 North, Range 54 East, Sections 1 and 12, Township 24 North, Range 54 East, and Sections 6 and 7, Township 24 North, Range 55 East, M.P.M., Richland County, Montana. Section 34, Township 25 North, Range 54 East, and Section 1, Township 24 North, Range 54 East, comprise a permanent spacing unit ("PSU") formed by Board Order 306-2003, and MorningStar Operating LLC operates the wells within the PSU. Section 12 (with Section 13), Township 24 North, Range 54 East, comprise a PSU formed by Board Order 149-2004, and MorningStar Operating LLC operates the wells within the PSU. Section 35, Township 25 North, Range 54 East, and Section 6, Township 24 North, Range 55 East, comprise a PSU formed by Board Order 41-2004, and MorningStar Operating LLC operates the wells within the PSU. Section 7, Township 24 North, Range 55 East, comprise a PSU formed by Board Order 16-2005, and MorningStar Operating LLC operates the wells within the PSU.

2. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill a horizontal Bakken/Three Forks formation well in an OTSU comprised of all of Sections 34 and 35, Township 25 North, Range 54 East, Sections 1 and 12, Township 24 North, Range 54 East, and Sections 6 and 7, Township 24 North, Range 55 East, M.P.M., Richland County, Montana. The well will be drilled at a location proximate to the common boundary between all of Section 34, Township 25 North, Range 54 East; and Sections 1 and 12, Township 24 North, Range 54 East, & all of Section 35, Township 25 North, Range 54 East; and Sections 6 and 7, Township 24 North, Range 55 East, with a heel/toe setback of 200'.

3. Lots 1-5, SE $\frac{1}{4}$ SW $\frac{1}{4}$ and the S $\frac{1}{2}$ SE $\frac{1}{4}$ of Section 6 (All), and Lots 1-4, and the E $\frac{1}{2}$ W $\frac{1}{2}$ of Section 7 (W $\frac{1}{2}$), Township 24 North, Range 55 East, include federal minerals and, therefore, the MOU between the United States BLM and the Board is applicable.

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4. Applicant will, within 90 days of successful completion of the proposed horizontal operation, file an application for the Board's consideration of permanent spacing and other matters relating to production from the well.

[B] Requests:

1. This matter be set for hearing, with notice given as required by law and the MOU;

2. After hearing the matter, the Board enter its order (i) creating an OTSU comprised of all of Sections 34 and 35, Township 25 North, Range 54 East, Sections 1 and 12, Township 24 North, Range 54 East, and Sections 6 and 7, Township 24 North, Range 55 East, M.P.M., Richland County, Montana, for purposes of drilling a horizontal Bakken/Three Forks formation well at a location proximate to the common boundary between all of Section 34, Township 25 North, Range 54 East; and Sections 1 and 12, Township 24 North, Range 54 East, & all of Section 35, Township 25 North, Range 54 East; and Sections 6 and 7, Township 24 North, Range 55 East, with a heel/toe setback of 200', and providing that the OTSU shall be limited to production from the proposed horizontal well with no allocation to portions of any existing spacing unit located outside of the OTSU boundaries; and (ii) any other relief that the Board deems appropriate.

Dated this 5th day of November, 2025.

MORNINGSTAR OPERATING LLC

By



Uriah J. Price, Its Attorney
Crowley Fleck, PLLP
P. O. Box 10969
Bozeman, MT 59719
uprice@crowleyfleck.com

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NOV 06 2025

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

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

IN THE MATTER OF THE APPLICATION OF MORNINGSTAR OPERATING LLC FOR AN ORDER CREATING A PERMANENT SPACING UNIT ("PSU") COMPRISED OF ALL OF SECTIONS 5, 6, 7 AND 8, TOWNSHIP 23 NORTH, RANGE 57 EAST, M.P.M., RICHLAND COUNTY, MONTANA, FOR THE PRODUCTION OF OIL AND ASSOCIATED NATURAL GAS FROM THE BAKKEN/THREE FORKS FORMATION FROM APPLICANT'S LOGAN ROY 7-6-1H WELL, AND ANY OTHER RELIEF THAT THE MBOGC MAY DEEM APPROPRIATE.

MBOGC DOCKET NO. 409-2025

APPLICATION

MORNINGSTAR OPERATING LLC, 400 W 7TH ST., FORT WORTH, TX 76102:

[A] Presents the following application:

1. Applicant is an interest owner and operator within the above-described lands, and its Logan Roy 7-6-1H well has been successfully completed as a commercial producer of oil and associated natural gas from the Bakken/Three Forks formation thereunder.

2. To efficiently and economically develop the reservoir, and to protect correlative rights of all owners in the captioned lands, all of Sections 5, 6, 7 and 8, Township 23 North, Range 57 East, M.P.M., Richland County, Montana, should be designated a PSU for the production of oil and associated natural gas from the Bakken/Three Forks formation from Applicant's Logan Roy 7-6-1H well.

[B] Requests:

1. This matter be set for hearing, with notice given as required by law and the MOU;

2. After hearing the matter, the Board enter an order (i) designating all of Sections 5, 6, 7 and 8, Township 23 North, Range 57 East, M.P.M., Richland County, Montana, a PSU for the production of oil and associated natural gas from the Bakken/Three Forks formation from Applicant's Logan Roy 7-6-1H well; and (ii) any other relief as the Board may deem appropriate.

Dated this 5th day of November, 2025.

MORNINGSTAR OPERATING LLC

By



Uriah J. Price, Its Attorney
Crowley Fleck, PLLP
P. O. Box 10969
Bozeman, MT 59719
uprice@crowleyfleck.com

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

IN THE MATTER OF THE APPLICATION OF MORNINGSTAR OPERATING LLC FOR AN ORDER POOLING ALL INTERESTS IN THE PERMANENT SPACING UNIT ("PSU") COMPRISED OF ALL OF SECTIONS 5, 6, 7 AND 8, TOWNSHIP 23 NORTH, RANGE 57 EAST, M.P.M., RICHLAND COUNTY, MONTANA, FOR THE PRODUCTION OF OIL AND ASSOCIATED NATURAL GAS FROM THE BAKKEN/THREE FORKS FORMATION FROM APPLICANT'S LOGAN ROY 7-6-1H WELL, AND ANY OTHER RELIEF THAT THE MBOGC MAY DEEM APPROPRIATE.

MBOGC DOCKET NO. 410-2025

APPLICATION

MORNINGSTAR OPERATING LLC, 400 W 7TH ST., FORT WORTH, TX 76102:

[A] Presents the following application:

1. Applicant is an interest owner and operator within the above-described lands, and its Logan Roy 7-6-1H well has been successfully completed as a commercial producer of oil and associated natural gas from the Bakken/Three Forks formation thereunder.
2. It is anticipated that the captioned lands will comprise a PSU for purposes of Bakken/Three Forks formation production, as to Applicant's Logan Roy 7-6-1H well, pursuant to Montana Board of Oil and Gas Conservation Order No. ____ -2025.
3. As of the date of this application, Applicant has been unable to establish voluntary pooling of all interests within the PSU with respect to the Logan Roy 7-6-1H well, and it is anticipated that such pooling cannot be consummated prior to the hearing on this application.
4. In the absence of voluntary pooling all interests within the proposed PSU, the pooling of all interests in the spacing unit for the development and operation thereof should be effectuated by an order of the Board for that purpose.


[B] Requests:

1. This matter be set for hearing, with notice given as required by law and the MOU;
2. After hearing the matter, the Board enter its order (i) pooling all interests in the PSU comprised of all of Sections 5, 6, 7 and 8, Township 23 North, Range 57 East, M.P.M., Richland County, Montana, for the production of oil and associated natural gas from the Bakken/Three Forks formation from Applicant's Logan Roy 7-6-1H well; and (ii) any other relief as the Board may deem appropriate.

Dated this 5th day of November, 2025.

MORNINGSTAR OPERATING LLC

By _____


Uriah J. Price, Its Attorney
Crowley Fleck, PLLP
P. O. Box 10969
Bozeman, MT 59719
uprice@crowleyfleck.com