

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

**IN THE MATTER OF THE APPLICATION
OF PHOENIX OPERATING LLC FOR AN
ORDER VACATING AND RESCINDING
BOARD ORDER NOS. 232-2010, 235-2010,
113-2025 & 114-2025 AND ADDITIONALLY
DESIGNATING AND DELINEATING A
TEMPORARY SPACING UNIT
CONSISTING OF SECTIONS 18, 19, 30 & 31,
TOWNSHIP 29 NORTH, RANGE 57 EAST,
ROOSEVELT COUNTY, AND
AUTHORIZING THE DRILLING OF AND
PRODUCTION FROM A HORIZONTAL
BAKKEN/THREE FORKS FORMATION
WELL WITHIN AND UPON THE
REQUESTED TEMPORARY SPACING
UNIT AT ANY LOCATION NOT CLOSER
THAN 200' TO THE HEEL/TOE SETBACKS
AND 500' TO THE LATERAL SETBACKS
OF THE REQUESTED TEMPORARY
SPACING UNIT.**

APPLICATION

MBOGC DOCKET NO. 411 - 2025

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NOV 10 2025

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

Phoenix Operating LLC ("Applicant"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, presents the following Application:

1. Applicant is the owner of oil and gas leasehold interests in, to and under the following described lands in Roosevelt County:

Township 29 North, Range 57 East, MPM

Section 18: Lots 1, 2, 3 & 4, E½W½, E½ (All)

Section 19: Lots 1, 2, 3 & 4, E½W½, E½ (All)

Section 30: Lots 1, 2, 3 & 4, E½W½, E½ (All)

Section 31: Lots 1, 2, 3 & 4, E½W½, E½ (All)

Containing 2,553.24 acres, more or less

2. Pursuant to Board Order No. 235-2010, dated October 14, 2010, this Board designated all of Sections 30 and 31, Township 29 North, Range 57 East, as a temporary spacing unit for the drilling of a Bakken Formation horizontal well. The proposed well the subject of the foregoing Order was never drilled nor has said Order been vacated by this Board and for good cause Applicant requests this Order be vacated and rescinded.
3. Pursuant to Board Order No. 113-2025, dated April 10, 2025, this Board designated Sections 6, 7 and 18, Township 29 North, Range 57 East, as an overlapping temporary spacing unit for the drilling of a Bakken/Three Forks Formation horizontal well. The proposed well the subject of the foregoing Order was never drilled nor has said Order been vacated by this Board and for good cause Applicant requests the foregoing Order be vacated and rescinded.

4. Pursuant to Board Order No. 114-2025, dated April 10, 2025, this Board authorized the drilling of up to three (3) additional horizontal Bakken/Three Forks Formation wells anywhere within the overlapping temporary spacing unit comprised of Sections 6, 7 and 18, Township 29 North, Range 57 East. The proposed wells the subject of the foregoing Order were never drilled nor has said Order been vacated by this Board and for good cause Applicant requests the foregoing Order be vacated and rescinded.
5. Applicant desires to drill a horizontal Bakken/Three Forks Formation well within and upon Sections 18, 19, 30 and 31, Township 29 North, Range 57 East, and in order to more efficiently and economically recover Bakken/Three Forks oil and associated natural gas therefrom believes the temporary spacing unit therefore should consist of all of Sections 18, 19, 30 and 31, Township 29 North, Range 57 East, containing 2,553.24 acres.
6. Applicant believes the requested 200' heel/toe setbacks and 500' lateral setbacks from the requested spacing unit boundaries are necessary in order to adequately and efficiently increase the ultimate recovery of Bakken/Three Forks Formation oil and associated natural gas from the requested temporary spacing unit.
7. In the event Applicant's proposed horizontal Bakken/Three Forks Formation well referred to above is authorized by this Board and thereafter drilled and completed as a well capable of commercial production of Bakken/Three Forks Formation oil and associated natural gas, within ninety (90) days of such completion Applicant will file an appropriate Application with this Board requesting a permanent spacing unit for said well and Bakken/Three Forks Formation oil and associated natural gas produced therefrom.
8. Applicant believes that granting of the requests herein will serve to protect the correlative rights of all interested parties and will be in the best interest of prevention of waste and conservation of Bakken/Three Forks Formation oil and natural gas produced in association therewith.

WHEREFORE, Applicant requests the following:

1. This matter be set for hearing by the Board and notice thereof be given as required by law;
2. After hearing this matter the Board enter its Order vacating and rescinding Board Order Nos. 235-2010, 113-2025 and 114-2025 and terminating the temporary spacing units created thereby and authorizing of the drilling of up to three (3) additional Bakken/Three Forks Formation wells;
3. After hearing this matter the Board enter its Order designating Sections 18, 19, 30 and 31, Township 29 North, Range 57 East, as a temporary spacing unit and authorizing Applicant to drill, complete and produce Bakken/Three Forks Formation oil and associated natural gas therefrom, provided that operations for the drilling of said well must commence within one (1) year of the date of the requested Order;
4. Within ninety (90) days of first production from the requested authorized Bakken/Three Forks Formation well Applicant shall submit an Application to the Board requesting the establishment of a permanent spacing unit

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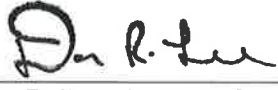
MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

therefore and the production of Bakken/Three Forks Formation oil and associated natural gas therefrom; and

5. For such other or additional relief as the Board may deem appropriate.

Dated November 6, 2025.

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

**IN THE MATTER OF THE APPLICATION
OF PHOENIX OPERATING LLC FOR AN
ORDER AUTHORIZING THE DRILLING
OF UP TO THREE (3) ADDITIONAL
HORIZONTAL BAKKEN/THREE FORKS
FORMATION WELLS WITHIN AND UPON
THE TEMPORARY SPACING UNIT
COMPRISED OF ALL OF SECTIONS 18, 19,
30 & 31, TOWNSHIP 29 NORTH, RANGE 57
EAST, ROOSEVELT COUNTY, AT ANY
LOCATIONS NOT CLOSER THAN 200'
(HEEL/TOE SETBACKS) AND 500'
(LATERAL SETBACKS) TO THE
BOUNDARIES THEREOF, AND SUCH
OTHER AND FURTHER RELIEF AS THE
BOARD MAY DEEM APPROPRIATE.**

APPLICATION

MBOGC DOCKET NO. 412-2025

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

Phoenix Operating LLC ("Applicant"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, presents the following Application:

1. Applicant is the owner of oil and gas leasehold interests in, to and under the following described lands in Roosevelt County:

Township 29 North, Range 57 East, MPM

Section 18: Lots 1, 2, 3 & 4, E½W½, E½ (All)

Section 19: Lots 1, 2, 3 & 4, E½W½, E½ (All)

Section 30: Lots 1, 2, 3 & 4, E½W½, E½ (All)

Section 31: Lots 1, 2, 3 & 4, E½W½, E½ (All)

Containing 2,553.24 acres, more or less

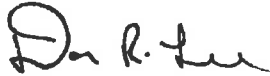
2. Applicant requests an Order from this Board authorizing the drilling of and production of up to three (3) additional horizontal Bakken/Three Forks Formation wells within and upon the temporary spacing unit comprised of Sections 18, 19, 30 and 31, Township 29 North, Range 57 East, at any location not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks) to the exterior boundaries of said temporary spacing unit.
3. Applicant believes that approval and granting of the request herein will be in the best interest of prevention of waste of oil and associated natural gas and the conservation thereof and will not adversely affect the correlative rights of any interested party.
4. In the event an authorized well is completed as a well capable of commercial production of Bakken/Three Forks Formation oil and associated natural gas, Applicant will submit within ninety (90) days of first production from any such well an Application with this Board requesting the establishment of a permanent spacing unit therefore.

WHEREFORE, Applicant requests the following:

1. This matter be set for hearing by this Board and notice thereof be given as required by law;
2. After hearing this matter this Board enter its Order authorizing the Applicant to drill up to three (3) additional Bakken/Three Forks Formation wells within and upon the temporary spacing unit consisting of Sections 18, 19, 30 and 31, Township 29 North, Range 57 East, but not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks) to the exterior boundaries of said temporary spacing unit;
3. Within ninety (90) days of first production from any authorized Bakken/Three Forks Formation well Applicant shall submit an Application to this Board requesting the establishment of a permanent spacing unit therefore; and
4. For such other or additional relief as this Board may deem appropriate.

Dated November 6, 2025.

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

AND

**BEFORE THE UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT**

<p>IN THE MATTER OF THE APPLICATION OF PHOENIX OPERATING LLC FOR AN ORDER VACATING AND RESCINDING BOARD ORDER NOS. 234-2010, 111-2025 & 112-2025 AND VACATE BLM ORDER NOS. 4-2025 FED & 19-2025 FED AND ADDITIONALLY DESIGNATING AND DELINEATING A TEMPORARY SPACING UNIT CONSISTING OF SECTIONS 17, 20, 29 & 32, TOWNSHIP 29 NORTH, RANGE 57 EAST, ROOSEVELT COUNTY, AND AUTHORIZING THE DRILLING OF AND PRODUCTION FROM A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL WITHIN AND UPON THE REQUESTED TEMPORARY SPACING UNIT AT ANY LOCATION NOT CLOSER THAN 200' TO THE HEEL/TOE SETBACKS AND 500' TO THE LATERAL SETBACKS OF THE REQUESTED TEMPORARY SPACING UNIT.</p>	<p style="color: red; font-weight: bold; font-size: 1.2em;">RECEIVED</p> <p style="color: red; font-weight: bold; font-size: 1.1em;">NOV 10 2025</p> <p style="color: red; font-weight: bold; font-size: 0.8em;">MONTANA BOARD OF OIL & GAS CONSERVATION • BILLINGS</p> <p style="font-weight: bold; font-size: 1.1em;">APPLICATION</p> <p style="font-weight: bold; font-size: 1.1em;">MBOGC DOCKET NO. <u>413</u> - 2025</p> <p style="font-weight: bold; font-size: 1.1em;">and</p> <p style="font-weight: bold; font-size: 1.1em;">BLM DOCKET NO. <u>9</u> - 2025⁶</p>
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Phoenix Operating LLC ("Applicant"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, presents the following Application:

1. Applicant is the owner of oil and gas leasehold interests in, to and under the following described lands in Roosevelt County:

Township 29 North, Range 57 East, MPM

Section 17: All

Section 20: All

Section 29: All

Section 32: All

Containing 2,560.00 acres, more or less

2. Pursuant to Board Order No. 234-2010, dated October 14, 2010, this Board designated all of Sections 29 and 32, Township 29 North, Range 57 East, as a temporary spacing unit for the drilling of a Bakken Formation horizontal well. The proposed well the subject of the foregoing Order was never drilled nor has said Order been vacated by this Board and for good cause Applicant requests this Order be vacated and rescinded.
3. Pursuant to Board Order No. 111-2025, dated April 10, 2025, this Board designated Sections 5, 8 and 17, Township 29 North, Range 57 East, as an overlapping temporary spacing unit for the drilling of a Bakken/Three Forks Formation horizontal well. The proposed well the subject of the foregoing Order was never drilled nor has said Order been vacated by this Board and for good cause Applicant requests the foregoing Order be vacated and rescinded.
4. Pursuant to Board Order No. 112-2025, dated April 10, 2025, this Board authorized the drilling of up to three (3) additional horizontal Bakken/Three Forms Formation wells anywhere within the temporary spacing unit comprised of all of Sections 5, 8 and 17, Township 29 North, Range 57 East. The proposed wells the subject of the foregoing Order were never drilled nor has said Order been vacated by this Board and for good cause Applicant request the foregoing Order be vacated and rescinded.
5. Pursuant to BLM Order No. 4-2025 FED, dated April 29, 2025, this Board designated all of Sections 5, 8 and 17, Township 29 North, Range 57 East, as a temporary spacing unit for the drilling of a Bakken Formation horizontal well. The proposed well the subject of the foregoing Order was never drilled nor has said Order been vacated by this BLM and for good cause Applicant requests this Order be vacated and rescinded.
6. Pursuant to BLM Order No. 19-2025, dated April 29, 2025, the BLM authorized the drilling of up to three (3) additional horizontal Bakken/Three Forms Formation wells anywhere within the temporary spacing unit comprised of all of Sections 5, 8 and 17, Township 29 North, Range 57 East, as it applies to Indian mineral lands. The proposed wells the subject of the foregoing Order were never drilled nor has said Order been vacated by this Board and for good cause Applicant request the foregoing Order be vacated and rescinded.
7. Applicant desires to drill a horizontal Bakken/Three Forks Formation well within and upon Sections 17, 20, 29 and 32, Township 29 North, Range 57 East, and in order to more efficiently and economically recover Bakken/Three Forks oil and associated natural gas therefrom believes the temporary spacing unit therefore should consist of all of Sections 17, 20, 29 and 32, Township 29 North, Range 57 East, containing 2,560.00 acres.
8. Applicant believes the requested 200' heel/toe setbacks and 500' lateral setbacks from the requested spacing unit boundaries are necessary in order to adequately and efficiently increase the ultimate recovery of Bakken/Three Forks Formation oil and associated natural gas from the requested temporary spacing unit.
9. In the event Applicant's proposed horizontal Bakken/Three Forks Formation well referred to above is authorized by this Board and thereafter drilled and completed as a well capable of commercial production of Bakken/Three Forks Formation oil and associated natural gas, within ninety (90) days of such completion Applicant will file an appropriate Application with this Board requesting a permanent spacing unit for said well and Bakken/Three Forks Formation oil and associated natural gas produced therefrom.

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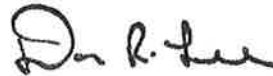
10. Applicant believes that granting of the requests herein will serve to protect the correlative rights of all interested parties and will be in the best interest of prevention of waste and conservation of Bakken/Three Forks Formation oil and natural gas produced in association therewith.

WHEREFORE, Applicant requests the following:

1. This matter be set for hearing by the Board and the BLM notice thereof be given as required by law;
2. After hearing this matter the Board enter its Order vacating and rescinding Board Order Nos. 234-2010, 111-2025 and 112-2025 and terminating the temporary spacing units created thereby and authorizing of the drilling of up to three (3) additional Bakken/Three Forks Formation wells;
3. After hearing this matter the BLM enter its Order vacating and rescinding BLM Order Nos. 4-2025 FED and 19-2025 FED and terminating the temporary spacing unit created thereby and authorizing of the drilling of up to three (3) additional Bakken/Three Forks Formation wells;
4. After hearing this matter the Board and the BLM enter its Orders designating Sections 17, 20, 29 and 32, Township 29 North, Range 57 East, as a temporary spacing unit and authorizing Applicant to drill, complete and produce Bakken/Three Forks Formation oil and associated natural gas therefrom, provided that operations for the drilling of said well must commence within one (1) year of the date of the requested Order;
5. Within ninety (90) days of first production from the requested authorized Bakken/Three Forks Formation well Applicant shall submit an Application to the Board and the BLM requesting the establishment of a permanent spacing unit therefore and the production of Bakken/Three Forks Formation oil and associated natural gas therefrom; and
6. For such other or additional relief as the Board and the BLM may deem appropriate.

Dated November 6, 2025.

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

**BEFORE THE UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT**

<p>IN THE MATTER OF THE APPLICATION OF PHOENIX OPERATING LLC FOR AN ORDER AUTHORIZING THE DRILLING OF UP TO THREE (3) ADDITIONAL HORIZONTAL BAKKEN/THREE FORKS FORMATION WELLS WITHIN AND UPON THE TEMPORARY SPACING UNIT COMPRISED OF ALL OF SECTIONS 17, 20, 29 & 32, TOWNSHIP 29 NORTH, RANGE 57 EAST, ROOSEVELT COUNTY, AT ANY LOCATIONS NOT CLOSER THAN 200' (HEEL/TOE SETBACKS) AND 500' (LATERAL SETBACKS) TO THE BOUNDARIES THEREOF, AND SUCH OTHER AND FURTHER RELIEF AS THE BOARD MAY DEEM APPROPRIATE.</p>	<p style="text-align:right">RECEIVED</p> <p style="text-align:right">NOV 10 2025</p> <p style="text-align:right">MONTANA BOARD OF OIL & GAS CONSERVATION • BILLINGS</p> <p style="text-align:center">APPLICATION</p> <p style="text-align:center">MBOGC DOCKET NO. <u>414</u>-2025</p>
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Phoenix Operating LLC ("Applicant"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, presents the following Application:

1. Applicant is the owner of oil and gas leasehold interests in, to and under the following described lands in Roosevelt County:

Township 29 North, Range 57 East, MPM

Section 17: All

Section 20: All

Section 29: All

Section 32: All

Containing 2,560.00 acres, more or less

2. Applicant requests an Order from this Board authorizing the drilling of and production of up to three (3) additional horizontal Bakken/Three Forks Formation wells within and upon the temporary spacing unit comprised of Sections 17, 20, 29 and 32, Township 29 North, Range 57 East, at any location not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks) to the exterior boundaries of said temporary spacing unit.

3. Applicant believes that approval and granting of the request herein will be in the best interest of prevention of waste of oil and associated natural gas and the conservation thereof and will not adversely affect the correlative rights of any interested party.
4. In the event an authorized well is completed as a well capable of commercial production of Bakken/Three Forks Formation oil and associated natural gas, Applicant will submit within ninety (90) days of first production from any such well an Application with this Board requesting the establishment of a permanent spacing unit therefore.

WHEREFORE, Applicant requests the following:

1. This matter be set for hearing by this Board and the BLM and notice thereof be given as required by law;
2. After hearing this matter this Board and the BLM enter its Orders authorizing the Applicant to drill up to three (3) additional Bakken/Three Forks Formation wells within and upon the temporary spacing unit consisting of Sections 17, 20, 29 and 32, Township 29 North, Range 57 East, but not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks) to the exterior boundaries of said temporary spacing unit;
3. Within ninety (90) days of first production from any authorized Bakken/Three Forks Formation well Applicant shall submit an Application to this Board and the BLM requesting the establishment of a permanent spacing unit therefore; and
4. For such other or additional relief as this Board and the BLM may deem appropriate.

Dated November 6, 2025.

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**MONTANA BOARD OF OIL &
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BEFORE THE BOARD OF OIL AND GAS CONSERVATION
OF THE STATE OF MONTANA
AND
BEFORE THE DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

IN THE MATTER OF THE APPLICATION OF PHOENIX OPERATING LLC FOR AN ORDER VACATING AND RESCINDING BOARD ORDER NOS. 127-2025 & 128-2025 AND BLM ORDER NOS. 12-2011, 12-2011 AMENDMENT #1, 9-2012 FED, 22-2025 FED & 24-2025 FED AND ADDITIONALLY DESIGNATING AND DELINEATING AN OVERLAPPING TEMPORARY SPACING UNIT CONSISTING OF SECTIONS 5, 8, 17 & 20, TOWNSHIP 28 NORTH, RANGE 57 EAST, ROOSEVELT COUNTY, AND AUTHORIZING THE DRILLING OF AND PRODUCTION FROM A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL WITHIN AND UPON THE REQUESTED OVERLAPPING TEMPORARY SPACING UNIT AT ANY LOCATION NOT CLOSER THAN 200' TO THE HEEL/TOE SETBACKS AND 500' TO THE LATERAL SETBACKS OF THE REQUESTED OVERLAPPING TEMPORARY SPACING UNIT.

APPLICATION

MBOGC DOCKET NO. 415 - 2025

BLM DOCKET NO. 10 - 2025⁶

Phoenix Operating LLC ("Applicant"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, presents the following Application:

1. Applicant is the owner of oil and gas leasehold interests in, to and under the following described lands in Roosevelt County:

Township 28 North, Range 57 East, MPM

Section 5: Lots 1, 2, 3 & 4, S $\frac{1}{2}$ N $\frac{1}{2}$, S $\frac{1}{2}$ (All)

Section 8: All

Section 17: All

Section 20: All

Containing 2,571.80 acres, more or less

2. Pursuant to BLM Order No. 12-2011 FED Amendment #1, dated January 30, 2012, the BLM amended the BLM Order No. 12-2011 FED dated March 18, 2011, by designating the W½W½ of Section 21, Township 28 North, Range 59 East, as Indian land. The proposed well the subject of the foregoing was never drilled nor said Order been vacated by the BLM and for good cause Applicant requests the foregoing Order be vacated and rescinded.
3. Pursuant to BLM Order No. 9-2012 FED, dated January 31, 2012, the BLM authorized the drilling of up to four (4) horizontal Bakken/Three Forms Formation wells in the spacing unit comprised of all of Sections 20 and 21, Township 28 North, Range 57 East. The proposed well the subject of the foregoing was never drilled nor said Order been vacated by the BLM and for good cause Applicant requests the foregoing Order be vacated and rescinded.
4. Pursuant to Board Order No. 127-2025, dated June 12, 2025, this Board designated all of Sections 8, 17 and 20, Township 28 North, Range 57 East, as an overlapping temporary spacing unit for the drilling of a Bakken/Three Forks Formation horizontal well. The proposed well the subject of the foregoing Order was never drilled nor has said Order been vacated by this Board and for good cause Applicant requests this Order be vacated and rescinded.
5. Pursuant to BLM Order No. 24-2025 FED, the BLM designated all of Sections 8, 17 and 20, Township 28 North, Range 57 East, as an overlapping temporary spacing unit for the drilling of a Bakken/Three Forks Formation horizontal well. The proposed well the subject of the foregoing Order was never drilled nor has said Order been vacated by the BLM and for good cause Applicant requests this Order be vacated and rescinded.
6. Pursuant to Board Order No. 128-2025, dated June 12, 2015, this Board authorized the drilling of up to three (3) additional horizontal Bakken/Three Forms Formation wells in the overlapping spacing unit comprised of all of Sections 8, 17 and 20, Township 28 North, Range 57 East. The proposed well the subject of the foregoing was never drilled nor said Order been vacated by this Board and for good cause Applicant requests the foregoing Order be vacated and rescinded.
7. Applicant desires to drill a horizontal Bakken/Three Forks Formation well within and upon Sections 5, 8, 17 and 20, Township 28 North, Range 57 East, and in order to more efficiently and economically recover Bakken/Three Forks oil and associated natural gas therefrom believes the overlapping temporary spacing unit therefore should consist of all of Sections 5, 8, 17 and 20, Township 28 North, Range 57 East, containing 2,571.80 acres.
8. Applicant believes the requested 200' heel/toe setbacks and 500' lateral setbacks from the requested spacing unit boundaries are necessary in order to adequately and efficiently increase the ultimate recovery of Bakken/Three Forks Formation oil and associated natural gas from the requested overlapping temporary spacing unit.
9. In the event Applicant's proposed horizontal Bakken/Three Forks Formation well referred to above is authorized by this Board and the BLM and thereafter drilled and completed as a well capable of commercial production of Bakken/Three Forks Formation oil and associated natural gas, within ninety (90) days of such completion Applicant will file an appropriate Application with this Board and the BLM requesting a permanent spacing unit for said well and Bakken/Three Forks Formation oil and associated natural gas produced therefrom.
10. Applicant believes that granting of the requests herein will serve to protect the correlative rights of all interested parties and will be in the best interest of prevention of waste and conservation of Bakken/Three Forks Formation oil and natural gas produced in association therewith.

WHEREFORE, Applicant requests the following:

1. This matter be set for hearing by the Board and the BLM and notice thereof be given as required by law;
2. After hearing this matter the Board enter its Order vacating and rescinding Board Order Nos. 127-2025 and 128-2025 and terminating the temporary spacing units created thereby;
3. After hearing this matter the BLM enter its Order vacating and rescinding Board Order Nos. 12-2011 FED, 12-2011 FED AMENDMENT NO. 1, 9-2012 FED and 24-2025 FED and terminating the temporary spacing units created thereby;
4. After hearing this matter the Board and the BLM enter its Orders designating Sections 5, 8, 17 and 20, Township 28 North, Range 57 East, as an overlapping temporary spacing unit and authorizing Applicant to drill, complete and produce Bakken/Three Forks Formation oil and associated natural gas therefrom, provided that operations for the drilling of said well must commence within one (1) year of the date of the requested Order;
5. Within ninety (90) days of first production from the requested authorized Bakken/Three Forks Formation well Applicant shall submit an Application to the Board and the BLM requesting the establishment of a permanent spacing unit therefore and the production of Bakken/Three Forks Formation oil and associated natural gas therefrom; and
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IN THE MATTER OF THE APPLICATION OF PHOENIX OPERATING LLC FOR AN ORDER AUTHORIZING THE DRILLING OF UP TO THREE (3) ADDITIONAL HORIZONTAL BAKKEN/THREE FORKS FORMATION WELLS WITHIN AND UPON THE OVERLAPPING TEMPORARY SPACING UNIT COMPRISED OF ALL OF SECTIONS 5, 8, 17 & 20, TOWNSHIP 28 NORTH, RANGE 57 EAST, ROOSEVELT COUNTY, AT ANY LOCATIONS NOT CLOSER THAN 200' (HEEL/TOE SETBACKS) AND 500' (LATERAL SETBACKS) TO THE BOUNDARIES THEREOF, AND SUCH OTHER AND FURTHER RELIEF AS THE BOARD MAY DEEM APPROPRIATE.

APPLICATION

MBOGC DOCKET NO. 416-2025

BLM DOCKET NO. 11 - 2025⁶

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1. Applicant is the owner of oil and gas leasehold interests in, to and under the following described lands in Roosevelt County:

Township 28 North, Range 57 East, MPM

Section 5: Lots 1, 2, 3 & 4, S½N½, S½ (All)

Section 8: All

Section 17: All

Section 20: All

Containing 2,571.80 acres, more or less

2. Applicant requests an Order from this Board and the BLM authorizing the drilling of and production of up to three (3) additional horizontal Bakken/Three Forks Formation wells within and upon an overlapping temporary spacing unit comprised of Sections 5, 8, 17 and 20, Township 28 North, Range 57 East, at any location not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks) to the exterior boundaries of said temporary spacing unit.

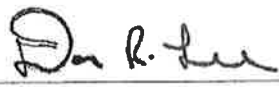
3. Applicant believes that approval and granting of the request herein will be in the best interest of prevention of waste of oil and associated natural gas and the conservation thereof and will not adversely affect the correlative rights of any interested party.
4. In the event an authorized well is completed as a well capable of commercial production of Bakken/Three Forks Formation oil and associated natural gas, Applicant will submit within ninety (90) days of first production from any such well an Application with this Board and the BLM requesting the establishment of a permanent spacing unit therefore.

WHEREFORE, Applicant requests the following:

1. This matter be set for hearing by this Board and the BLM and notice thereof be given as required by law;
2. After hearing this matter this Board and the BLM enter its Orders authorizing the Applicant to drill up to three (3) additional Bakken/Three Forks Formation wells within and upon the temporary spacing unit consisting of Sections 5, 8, 17 and 20, Township 28 North, Range 57 East, but not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks) to the exterior boundaries of said temporary spacing unit;
3. Within ninety (90) days of first production from any authorized Bakken/Three Forks Formation well Applicant shall submit an Application to this Board requesting the establishment of a permanent spacing unit therefore; and
4. For such other or additional relief as this Board and the BLM may deem appropriate.

Dated November 6, 2025.

LEE LAW OFFICE PC

By: 
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**BEFORE THE BOARD OF OIL AND GAS CONSERVATION
OF THE STATE OF MONTANA
AND
BEFORE THE DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT**

**IN THE MATTER OF THE APPLICATION
OF PHOENIX OPERATING LLC FOR AN
ORDER VACATING AND RESCINDING
BOARD ORDER NOS. 81-2023, 123-2025 &
124-2025 AND BLM ORDER NOS. 20-2025
FED & 21-2025 FED AND ADDITIONALLY
DESIGNATING AND DELINEATING AN
OVERLAPPING TEMPORARY SPACING
UNIT CONSISTING OF SECTIONS 3, 10 &
15, TOWNSHIP 28 NORTH, RANGE 57
EAST, ROOSEVELT COUNTY, AND
AUTHORIZING THE DRILLING OF AND
PRODUCTION FROM A HORIZONTAL
BAKKEN/THREE FORKS FORMATION
WELL WITHIN AND UPON THE
REQUESTED OVERLAPPING
TEMPORARY SPACING UNIT AT ANY
LOCATION NOT CLOSER THAN 200' TO
THE HEEL/TOE SETBACKS AND 500' TO
THE LATERAL SETBACKS OF THE
REQUESTED OVERLAPPING
TEMPORARY SPACING UNIT.**

APPLICATION

MBOGC DOCKET NO. 411 - 2025

BLM ORDER NO. 12 - 2025⁶

Phoenix Operating LLC ("Applicant"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, presents the following Application:

1. Applicant is the owner of oil and gas leasehold interests in, to and under the following described lands in Roosevelt County:
 - Township 28 North, Range 57 East, MPM
 - Section 3: Lots 1, 2, 3 & 4, S½N½, S½ (All)
 - Section 10: All
 - Section 15: All
 - Containing 1,934.28 acres, more or less
2. Pursuant to Board Order No. 81-2023, dated August 10, 2023, this Board designated all of Sections 3 and 4, Township 28 North, Range 57 East, as a temporary spacing unit for the drilling of a Bakken/Three Forks Formation horizontal well. The proposed well the subject of the foregoing

Order was never drilled nor has said Order been vacated by this Board and for good cause Applicant requests this Order be vacated and rescinded.

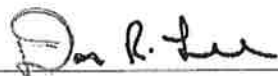
3. Pursuant to Board Order No. 123-2025, dated June 12, 2025, this Board designated Sections 10, 15, 22 and 27, Township 28 North, Range 57 East, as an overlapping temporary spacing unit for the drilling of a Bakken/Three Forks Formation horizontal well. The proposed well the subject of the foregoing Order was never drilled nor has said Order been vacated by this Board and for good cause Applicant requests the foregoing Order be vacated and rescinded.
4. Pursuant to BLM Order No. 20-2025 FED, dated July 21, 2025, the BLM designated all of Sections 10, 15, 22 and 27, Township 28 North, Range 57 East, as a temporary spacing unit for the drilling of a Bakken Formation horizontal well. The proposed well the subject of the foregoing Order was never drilled nor has said Order been vacated by this BLM and for good cause Applicant requests this Order be vacated and rescinded by the BLM.
5. Pursuant to Board Order No. 124-2025, dated June 12, 2025, this Board authorized the drilling of up to three (3) additional horizontal Bakken/Three Forms Formations wells within the overlapping temporary spacing unit comprised of Sections 10, 15, 22 and 27, Township 38 North, Range 57 East. The proposed well the subject of the foregoing Order was never drilled nor has said Order been vacated by the BLM and for good cause Applicant requests the foregoing Order be vacated and rescinded.
6. Pursuant to BLM Order No. 21-2025 FED, dated July 21, 2025, the BLM authorized the drilling of up to three (3) additional horizontal Bakken/Three Forms Formations wells within the overlapping temporary spacing unit comprised of Sections 10, 15, 22 and 27, Township 38 North, Range 57 East. The proposed well the subject of the foregoing Order was never drilled nor has said Order been vacated by the BLM and for good cause Applicant requests the foregoing Order be vacated and rescinded by the BLM.
7. Applicant desires to drill a horizontal Bakken/Three Forks Formation well within and upon Sections 3, 10 and 15, Township 28 North, Range 57 East, and in order to more efficiently and economically recover Bakken/Three Forks oil and associated natural gas therefrom believes the overlapping temporary spacing unit therefore should consist of all of Sections 3, 10 and 15, Township 28 North, Range 57 East, containing 2,560.00 acres.
8. Applicant believes the requested 200' heel/toe setbacks and 500' lateral setbacks from the requested overlapping spacing unit boundaries are necessary in order to adequately and efficiently increase the ultimate recovery of Bakken/Three Forks Formation oil and associated natural gas from the requested overlapping temporary spacing unit.
9. In the event Applicant's proposed horizontal Bakken/Three Forks Formation well referred to above is authorized by this Board and the BLM and thereafter drilled and completed as a well capable of commercial production of Bakken/Three Forks Formation oil and associated natural gas, within ninety (90) days of such completion Applicant will file an appropriate Application with this Board and the BLM requesting a permanent spacing unit for said well and Bakken/Three Forks Formation oil and associated natural gas produced therefrom.
10. Applicant believes that granting of the requests herein will serve to protect the correlative rights of all interested parties and will be in the best interest of prevention of waste and conservation of Bakken/Three Forks Formation oil and natural gas produced in association therewith.

WHEREFORE, Applicant requests the following:

1. This matter be set for hearing by the Board and the BLM and notice thereof be given as required by law;
2. After hearing this matter the Board enter its Order vacating and rescinding Board Order Nos. 81-2023, 123-2025 and 124-2025 and terminating the temporary spacing units created thereby and authorizing the drilling of up to three (3) additional Bakken/Three Forks Formation wells;
3. After hearing this matter the BLM enter its Order vacating and rescinding BLM Order Nos. 20-2025 FED & 21-2025 FED and terminating the temporary spacing units created thereby and authorizing the drilling of up to three (3) additional Bakken/three Forks Formation wells;
4. After hearing this matter the Board and the BLM enter its Orders designating Sections 3, 10 and 15, Township 28 North, Range 57 East, as an overlapping temporary spacing unit and authorizing Applicant to drill, complete and produce Bakken/Three Forks Formation oil and associated natural gas therefrom, provided that operations for the drilling of said well must commence within one (1) year of the date of the requested Order;
5. Within ninety (90) days of first production from the requested authorized Bakken/Three Forks Formation well Applicant shall submit an Application to the Board and the BLM requesting the establishment of a permanent spacing unit therefore and the production of Bakken/Three Forks Formation oil and associated natural gas therefrom; and
6. For such other or additional relief as the Board and the BLM may deem appropriate.

Dated November 6, 2025.

LEE LAW OFFICE PC

By: 
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**BEFORE THE BOARD OF OIL AND GAS CONSERVATION
OF THE STATE OF MONTANA
AND
BEFORE THE DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT**

**IN THE MATTER OF THE APPLICATION
OF PHOENIX OPERATING LLC FOR AN
ORDER AUTHORIZING THE DRILLING
OF UP TO THREE (3) ADDITIONAL
HORIZONTAL BAKKEN/THREE FORKS
FORMATION WELLS WITHIN AND UPON
THE OVERLAPPING TEMPORARY
SPACING UNIT COMPRISED OF ALL OF
SECTIONS 3, 10 & 15, TOWNSHIP 28
NORTH, RANGE 57 EAST, ROOSEVELT
COUNTY, AT ANY LOCATIONS NOT
CLOSER THAN 200' (HEEL/TOE
SETBACKS) AND 500' (LATERAL
SETBACKS) TO THE BOUNDARIES
THEREOF, AND SUCH OTHER AND
FURTHER RELIEF AS THE BOARD MAY
DEEM APPROPRIATE.**

APPLICATION

MBOGC DOCKET NO. 418-2025

BLM DOCKET NO. 13 - 2025^b

Phoenix Operating LLC ("Applicant"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, presents the following Application:

1. Applicant is the owner of oil and gas leasehold interests in, to and under the following described lands in Roosevelt County:

Township 28 North, Range 57 East, MPM

Section 3: Lots 1, 2, 3 & 4, S½N½, S½ (All)

Section 10: All

Section 15: All

Containing 1,934.28 acres, more or less

2. Applicant requests an Order from this Board and the BLM authorizing the drilling of and production of up to three (3) additional horizontal Bakken/Three Forks Formation wells within and upon an overlapping temporary spacing unit comprised of Sections 3, 10 and 15, Township 28 North, Range 57 East, at any location not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks) to the exterior boundaries of said overlapping temporary spacing unit.

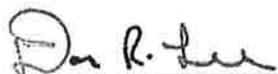
3. Applicant believes that approval and granting of the request herein will be in the best interest of prevention of waste of oil and associated natural gas and the conservation thereof and will not adversely affect the correlative rights of any interested party.
4. In the event an authorized well is completed as a well capable of commercial production of Bakken/Three Forks Formation oil and associated natural gas, Applicant will submit within ninety (90) days of first production from any such well an Application with this Board and the BLM requesting the establishment of a permanent spacing unit therefore.

WHEREFORE, Applicant requests the following:

1. This matter be set for hearing by this Board and the BLM and notice thereof be given as required by law;
2. After hearing this matter this Board and the BLM enter its Orders authorizing the Applicant to drill up to three (3) additional Bakken/Three Forks Formation wells within and upon the overlapping temporary spacing unit consisting of Sections 3, 10 and 15, Township 28 North, Range 57 East, but not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks) to the exterior boundaries of said temporary spacing unit;
3. Within ninety (90) days of first production from any authorized Bakken/Three Forks Formation well Applicant shall submit an Application to this Board and the BLM requesting the establishment of a permanent spacing unit therefore; and
4. For such other or additional relief as this Board and the BLM may deem appropriate.

Dated November 5, 2025.

LEE LAW OFFICE PC

By: 
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Shelby, MT 59474
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**BEFORE THE BOARD OF OIL AND GAS CONSERVATION
OF THE STATE OF MONTANA
AND
BEFOR THE DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT**

**IN THE MATTER OF THE APPLICATION
OF PHOENIX OPERATING LLC FOR AN
ORDER VACATING AND RESCINDING
BOARD ORDER NOS. ~~108-2010~~, 81-2023, 125-
2025 & 126-2025 AND BLM ORDER NOS. 12-
2011 FED AMENDMENT NO. 1, 9-2012 FED,
22-2025 FED & 23-2025 FED AND
ADDITIONALLY DESIGNATING AND
DELINEATING A TEMPORARY SPACING
UNIT CONSISTING OF SECTIONS 4, 9, 16
& 21, TOWNSHIP 28 NORTH, RANGE 57
EAST, ROOSEVELT COUNTY, AND
AUTHORIZING THE DRILLING OF AND
PRODUCTION FROM A HORIZONTAL
BAKKEN/THREE FORKS FORMATION
WELL WITHIN AND UPON THE
REQUESTED TEMPORARY SPACING
UNIT AT ANY LOCATION NOT CLOSER
THAN 200' TO THE HEEL/TOE SETBACKS
AND 500' TO THE LATERAL SETBACKS
OF THE REQUESTED TEMPORARY
SPACING UNIT.**

APPLICATION

MBOGC DOCKET NO. 419 - 2025

BLM DOCKET NO. 14 - 2025⁶

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GAS CONSERVATION • BILLINGS

Phoenix Operating LLC ("Applicant"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, presents the following Application:

1. Applicant is the owner of oil and gas leasehold interests in, to and under the following described lands in Roosevelt County:

Township 28 North, Range 57 East, MPM
Section 4: Lots 1, 2, 3 & 4, S½N½, S½ (All)
Section 9: All
Section 16: All
Section 21: All
Containing 1,933.520 acres, more or less

2. The United States of America, by and through the Department of the Interior, Bureau of Indian Affairs (“BIA”), is the Trustee of the oil and gas mineral estate underlying the W½W½ of Section 21. With regard to these Indian Trust Lands, the BIA has delegated drilling spacing units, well density, drainage, unit operations, APD approval, enforcement and inspection, and the like.
3. Pursuant to Board Order No. 108-2010, dated June 17, 2010, this Board designated all of Sections 9 and 16, Township 28 North, Range 57 East, as a temporary spacing unit for the drilling of a Bakken Formation horizontal well. The proposed well the subject of the foregoing Order was never drilled nor has said Order been vacated by this Board and for good cause Applicant requests this Order be vacated and rescinded.
4. Pursuant to BLM Order No. 12-2011 FED Amendment No.1, dated January 30, 2012, the BLM amended BLM Order No. 12-2011 FED by designating the W½W½ of Section 21, Township 28 North, Range 59 East, as Indian land. The proposed well the subject of the foregoing was never drilled nor said Order been vacated by the BLM and for good cause Applicant requests the foregoing Order be vacated and rescinded.
5. Pursuant to BLM Order No. 9-2012 FED, dated January 31, 2012, the BLM authorized the drilling of up to four (4) horizontal Bakken/Three Forks Formation wells in the spacing unit comprised of all of Sections 20 and 21, Township 28 North, Range 57 East. The proposed well the subject of the foregoing was never drilled nor said Order been vacated by the BLM and for good cause Applicant requests the foregoing Order be vacated and rescinded.
6. Pursuant to Board Order No. 81-2023, dated August 10, 2023, this Board designated all of Sections 3 and 4, Township 28 North, Range 57 East, as a temporary spacing unit for the drilling of a Bakken Formation horizontal well. The proposed well the subject of the foregoing Order was never drilled nor has said Order been vacated by this Board and for good cause Applicant requests this Order be vacated and rescinded.
7. Pursuant to Board Order No. 125-2025, dated June 12, 2025, this Board designated all of Sections 9, 16 and 21, Township 28 North, Range 57 East, as an overlapping temporary spacing unit for the drilling of a Bakken/Three Forks Formation horizontal well. The proposed well the subject of the foregoing Order was never drilled nor has said Order been vacated by this Board and for good cause Applicant requests this Order be vacated and rescinded.
8. Pursuant to BLM Order No. 22-2025 FED, dated July 21, 2025, the BLM Board designated all of Sections 9, 16 and 21, Township 28 North, Range 57 East, as an overlapping temporary spacing unit for the drilling of a Bakken/Three Forks Formation horizontal well. The proposed well the subject of the foregoing Order was never drilled nor has said Order been vacated by this Board and for good cause Applicant requests this Order be vacated and rescinded.
9. Pursuant to Board Order No. 126-2025, dated June 12, 2025, this Board authorized the drilling of up to four (4) horizontal Bakken/Three Forks Formation wells in the spacing unit comprised of all of Sections 9, 16 and 21, Township 28 North, Range 57 East. The proposed wells the subject of the foregoing were never drilled nor said Order been vacated by this Board and for good cause Applicant requests the foregoing Order be vacated and rescinded.

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MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

10. Pursuant to BLM Order No. 23-2025 FED, dated July 21, 2025, the BLM authorized the drilling of up to four (4) horizontal Bakken/Three Forks Formation wells in the spacing unit comprised of all of Sections 9, 16 and 21, Township 28 North, Range 57 East. The proposed wells the subject of the foregoing were never drilled nor said Order been vacated by this Board and for good cause Applicant requests the foregoing Order be vacated and rescinded.
11. Applicant desires to drill a horizontal Bakken/Three Forks Formation well within and upon Sections 4, 9, 16 and 21, Township 28 North, Range 57 East, and in order to more efficiently and economically recover Bakken/Three Forks oil and associated natural gas therefrom believes the temporary spacing unit therefore should consist of all of Sections 4, 9, 16 and 21, Township 28 North, Range 57 East, containing 2,560.00 acres.
12. Applicant believes the requested 200' heel/toe setbacks and 500' lateral setbacks from the requested spacing unit boundaries are necessary in order to adequately and efficiently increase the ultimate recovery of Bakken/Three Forks Formation oil and associated natural gas from the requested temporary spacing unit.
13. In the event Applicant's proposed horizontal Bakken/Three Forks Formation well referred to above is authorized by this Board and thereafter drilled and completed as a well capable of commercial production of Bakken/Three Forks Formation oil and associated natural gas, within ninety (90) days of such completion Applicant will file an appropriate Application with this Board requesting a permanent spacing unit for said well and Bakken/Three Forks Formation oil and associated natural gas produced therefrom.
14. Applicant believes that granting of the requests herein will serve to protect the correlative rights of all interested parties and will be in the best interest of prevention of waste and conservation of Bakken/Three Forks Formation oil and natural gas produced in association therewith.

WHEREFORE, Applicant requests the following:

1. This matter be set for hearing by the Board and the BLM and notice thereof be given as required by law;
2. After hearing this matter the Board enter its Order vacating and rescinding Board Order Nos. 108-2010, 81-2023, 125-2025 and 126-2025 and terminating the temporary spacing units created thereby and authorizing the drilling of up to four (4) horizontal Bakken/Three Forks Formation wells;
3. After hearing this matter the BLM enter its Orders vacating and rescinding BLM Order Nos. 12-2011, 9-2012, 22-2025 FED and 23-2025 FED.
4. After hearing this matter the Board and the BLM enter its Orders designating Sections 4, 9, 16 and 21, Township 28 North, Range 57 East, as a temporary spacing unit and authorizing Applicant to drill, complete and produce Bakken/Three Forks Formation oil and associated natural gas therefrom, provided that operations for the drilling of said well must commence within one (1) year of the date of the requested Order;
5. Within ninety (90) days of first production from the requested authorized Bakken/Three Forks Formation well Applicant shall submit an Application to the Board and the BLM requesting the establishment of a permanent

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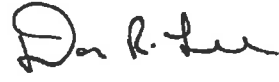
MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

spacing unit therefore and the production of Bakken/Three Forks Formation oil and associated natural gas therefrom; and

6. For such other or additional relief as the Board and the BLM may deem appropriate.

Dated November 6, 2025.

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NOV 10 2025

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

**BEFORE THE BOARD OF OIL AND GAS CONSERVATION
OF THE STATE OF MONTANA
AND
BEFORE THE DEPARTMENT OF THE INTERIEOR
BUREAU OF LAND MANAGEMENT**

**IN THE MATTER OF THE APPLICATION
OF PHOENIX OPERATING LLC FOR AN
ORDER AUTHORIZING THE DRILLING
OF UP TO THREE (3) ADDITIONAL
HORIZONTAL BAKKEN/THREE FORKS
FORMATION WELLS WITHIN AND UPON
THE OVERLAPPING TEMPORARY
SPACING UNIT COMPRISED OF ALL OF
SECTIONS 4, 9, 16 & 21, TOWNSHIP 28
NORTH, RANGE 57 EAST, ROOSEVELT
COUNTY, AT ANY LOCATIONS NOT
CLOSER THAN 200' (HEEL/TOE
SETBACKS) AND 500' (LATERAL
SETBACKS) TO THE BOUNDARIES
THEREOF, AND SUCH OTHER AND
FURTHER RELIEF AS THE BOARD MAY
DEEM APPROPRIATE.**

APPLICATION

MBOGC DOCKET NO. 420-2025

BLM DOCKET NO. 15 - 2025^b

Phoenix Operating LLC ("Applicant"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, presents the following Application:

1. Applicant is the owner of oil and gas leasehold interests in, to and under the following described lands in Roosevelt County:

Township 28 North, Range 57 East, MPM
Section 4: Lots 1, 2, 3 & 4, S½N½, S½ (All)
Section 9: All
Section 16: All
Section 21: All
Containing 1,933.52 acres, more or less

2. The United States of America, by and through the Department of the Interior, Bureau of Indian Affairs ("BIA"), is the Trustee of the oil and gas mineral estate underlying the W½W½ of Section 21. With regard to these Indian Trust Lands, the BIA has delegated drilling spacing units, well density, drainage, unit operations, APD approval, enforcement and inspection, and the like.

3. Applicant requests an Order from this Board and the BLM authorizing the drilling of and production of up to three (3) additional horizontal Bakken/Three Forks Formation wells within and upon the overlapping temporary spacing unit comprised of Sections 4, 9, 16 and 21, Township 28 North, Range 57 East, at any location not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks) to the exterior boundaries of said temporary spacing unit.
4. Applicant believes that approval and granting of the request herein will be in the best interest of prevention of waste of oil and associated natural gas and the conservation thereof and will not adversely affect the correlative rights of any interested party.
5. In the event an authorized well is completed as a well capable of commercial production of Bakken/Three Forks Formation oil and associated natural gas, Applicant will submit within ninety (90) days of first production from any such well an Application with this Board and the BLM requesting the establishment of a permanent spacing unit therefore.

WHEREFORE, Applicant requests the following:

1. This matter be set for hearing by this Board and the BLM and notice thereof be given as required by law;
2. After hearing this matter this Board and the BLM enter its Orders authorizing the Applicant to drill up to three (3) additional Bakken/Three Forks Formation wells within and upon the overlapping temporary spacing unit consisting of Sections 4, 9, 16 and 21, Township 28 North, Range 57 East, but not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks) to the exterior boundaries of said overlapping temporary spacing unit;
3. Within ninety (90) days of first production from any authorized Bakken/Three Forks Formation well Applicant shall submit an Application to this Board and the BLM requesting the establishment of a permanent spacing unit therefore; and
4. For such other or additional relief as this Board and the BLM may deem appropriate.

Dated November 6, 2025.

LEE LAW OFFICE PC

By: 

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

**IN THE MATTER OF THE APPLICATION
OF PHOENIX OPERATING LLC FOR AN
ORDER VACATING AND RESCINDING
BOARD ORDER NOS. 4-2011, 30-2011 & 340-
2011 AND ADDITIONALLY DESIGNATING
AND DELINEATING A TEMPORARY
SPACING UNIT CONSISTING OF
SECTIONS 16, 21, 28 & 33, TOWNSHIP 28
NORTH, RANGE 56 EAST, ROOSEVELT
COUNTY, AND AUTHORIZING THE
DRILLING OF AND PRODUCTION FROM
A HORIZONTAL BAKKEN/THREE FORKS
FORMATION WELL WITHIN AND UPON
THE REQUESTED TEMPORARY SPACING
UNIT AT ANY LOCATION NOT CLOSER
THAN 200' TO THE HEEL/TOE SETBACKS
AND 500' TO THE LATERAL SETBACKS
OF THE REQUESTED TEMPORARY
SPACING UNIT.**

APPLICATION

MBOGC DOCKET NO. 421 - 2025

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

Phoenix Operating LLC ("Applicant"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, presents the following Application:

1. Applicant is the owner of oil and gas leasehold interests in, to and under the following described lands in Roosevelt County:

Township 28 North, Range 56 East, MPM

Section 16: All

Section 21: All

Section 28: All

Section 33: All

Containing 2,560.00 acres, more or less

2. Pursuant to Board Order No. 4-2011, dated February 10, 2011, this Board designated all of Sections 20 and 21, Township 28 North, Range 56 East, as a temporary spacing unit for the drilling of a Bakken Formation horizontal well. The proposed well the subject of the foregoing Order was never drilled nor has said Order been vacated by this Board and for good cause Applicant requests this Order be vacated and rescinded.
3. Pursuant to Board Order No. 30-2011, dated February 10, 2011, this Board designated all of Sections 28 and 33, Township 28 North, Range 56 East, as a temporary spacing unit for the drilling of a Bakken Formation horizontal well. The proposed well the subject of the foregoing Order was never drilled nor has said Order been vacated by this Board and for good cause Applicant requests this Order be vacated and rescinded.

4. Pursuant to Board Order No. 340-2011, dated October 13, 2011, this Board amended Board Order 30-2011 to authorize the drilling of a horizontal Bakken/Three Forks Formation well in the temporary spacing unit comprised of all of Sections 28 and 33, Township 28 North, Range 56 East. The well the subject of the foregoing Order was never drilled nor has said Order been vacated by this Board and for good cause Applicant requests the foregoing Order be vacated and rescinded.
5. Applicant desires to drill a horizontal Bakken/Three Forks Formation well within and upon Sections 16, 21, 28 and 33, Township 28 North, Range 56 East, and in order to more efficiently and economically recover Bakken/Three Forks oil and associated natural gas therefrom believes the temporary spacing unit therefore should consist of all of Sections 16, 21, 28 and 33, Township 28 North, Range 56 East, containing 2,560.00 acres.
6. Applicant believes the requested 200' heel/toe setbacks and 500' lateral setbacks from the requested spacing unit boundaries are necessary in order to adequately and efficiently increase the ultimate recovery of Bakken/Three Forks Formation oil and associated natural gas from the requested temporary spacing unit.
7. In the event Applicant's proposed horizontal Bakken/Three Forks Formation well referred to above is authorized by this Board and thereafter drilled and completed as a well capable of commercial production of Bakken/Three Forks Formation oil and associated natural gas, within ninety (90) days of such completion Applicant will file an appropriate Application with this Board requesting a permanent spacing unit for said well and Bakken/Three Forks Formation oil and associated natural gas produced therefrom.
8. Applicant believes that granting of the requests herein will serve to protect the correlative rights of all interested parties and will be in the best interest of prevention of waste and conservation of Bakken/Three Forks Formation oil and natural gas produced in association therewith.

WHEREFORE, Applicant requests the following:

1. This matter be set for hearing by the Board and notice thereof be given as required by law;
2. After hearing this matter the Board enter its Order vacating and rescinding Board Order Nos. 4-2011, 30-2011 and 340-2011 and terminating the temporary spacing units created thereby;
3. After hearing this matter the Board enter its Order designating Sections 16, 21, 28 and 33, Township 28 North, Range 56 East, as a temporary spacing unit and authorizing Applicant to drill, complete and produce Bakken/Three Forks Formation oil and associated natural gas therefrom, provided that operations for the drilling of said well must commence within one (1) year of the date of the requested Order;
4. Within ninety (90) days of first production from the requested authorized Bakken/Three Forks Formation well Applicant shall submit an Application to the Board requesting the establishment of a permanent spacing unit therefore and the production of Bakken/Three Forks Formation oil and associated natural gas therefrom; and

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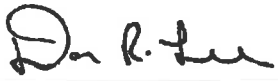
NOV 10 2025

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

5. For such other or additional relief as the Board may deem appropriate.

Dated November 6, 2025.

LEE LAW OFFICE PC

By: 
Don R. Lee, Attorney for Applicant
Lee Law Office PC
158 Main Street – P.O. Box 790
Shelby, MT 59474
Telephone: (406) 434-5244
Facsimile: (406) 434-5246
Email: don@leelawofficepc.com

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NOV 10 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 PHOENIX OPERATING LLC FOR AN ORDER AUTHORIZING THE DRILLING OF UP TO THREE (3) ADDITIONAL HORIZONTAL BAKKEN/THREE FORKS FORMATION WELLS WITHIN AND UPON THE TEMPORARY SPACING UNIT COMPRISED OF ALL OF SECTIONS 16, 21, 28 & 33, TOWNSHIP 28 NORTH, RANGE 56 EAST, ROOSEVELT COUNTY, AT ANY LOCATIONS NOT CLOSER THAN 200' (HEEL/TOE SETBACKS) AND 500' (LATERAL SETBACKS) TO THE BOUNDARIES THEREOF, AND SUCH OTHER AND FURTHER RELIEF AS THE BOARD MAY DEEM APPROPRIATE.	<p style="text-align:center">APPLICATION</p> <p style="text-align:center">MBOGC DOCKET NO. <u>422</u>-2025</p> <p style="text-align:right">RECEIVED</p> <p style="text-align:right">NOV 10 2025</p> <p style="text-align:right">MONTANA BOARD OF OIL & GAS CONSERVATION • BILLINGS</p>
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Phoenix Operating LLC ("Applicant"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, presents the following Application:

1. Applicant is the owner of oil and gas leasehold interests in, to and under the following described lands in Roosevelt County:

Township 28 North, Range 56 East, MPM

Section 16: All

Section 21: All

Section 28: All

Section 33: All

Containing 2,560.00 acres, more or less

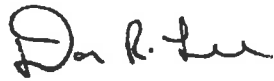
2. Applicant requests an Order from this Board authorizing the drilling of and production of up to three (3) additional horizontal Bakken/Three Forks Formation wells within and upon the temporary spacing unit comprised of Sections 16, 21, 28 and 33, Township 28 North, Range 56 East, at any location not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks) to the exterior boundaries of said temporary spacing unit.
3. Applicant believes that approval and granting of the request herein will be in the best interest of prevention of waste of oil and associated natural gas and the conservation thereof and will not adversely affect the correlative rights of any interested party.
4. In the event an authorized well is completed as a well capable of commercial production of Bakken/Three Forks Formation oil and associated natural gas, Applicant will submit within ninety (90) days of first production from any such well an Application with this Board requesting the establishment of a permanent spacing unit therefore.

WHEREFORE, Applicant requests the following:

1. This matter be set for hearing by this Board and notice thereof be given as required by law;
2. After hearing this matter this Board enter its Order authorizing the Applicant to drill up to three (3) additional Bakken/Three Forks Formation wells within and upon the temporary spacing unit consisting of Sections 16, 21, 28 and 33, Township 28 North, Range 56 East, but not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks) to the exterior boundaries of said temporary spacing unit;
3. Within ninety (90) days of first production from any authorized Bakken/Three Forks Formation well Applicant shall submit an Application to this Board requesting the establishment of a permanent spacing unit therefore; and
4. For such other or additional relief as this Board may deem appropriate.

Dated November 6, 2025.

LEE LAW OFFICE PC

By: 
Don R. Lee, Attorney for Applicant
Lee Law Office PC
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Shelby, MT 59474
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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 PHOENIX OPERATING LLC FOR AN
ORDER VACATING AND RESCINDING
BOARD ORDER NOS. 380-2011 & 241-2014
AND ADDITIONALLY DESIGNATING AND
DELINEATING AN OVERLAPPING
TEMPORARY SPACING UNIT (“OTSU”)
COMPRISED OF ALL OF SECTIONS 1 &
12, TOWNSHIP 29 NORTH, RANGE 58
EAST, AND SECTIONS 25 & 36, TOWNSHIP
30 NORTH, RANGE 58 EAST, ROOSEVELT
COUNTY, AND AUTHORIZING THE
DRILLING OF A HORIZONTAL
BAKKEN/THREE FORKS FORMATION
WELL THEREON AT ANY LOCATION
NOT CLOSER THAN 200’ TO THE
HEEL/TOE SETBACKS AND 500’ TO THE
LATERAL SETBACKS OF THE
REQUESTED OTSU.**

APPLICATION

MBOGC DOCKET NO. 423-2025

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

Phoenix Operating LLC (“Applicant”), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, presents the following Application:

1. Applicant is an interest owner within portions of Sections 1 and 12, Township 29 North, Range 58 East, and Sections 25 and 36, Township 30 North, Range 58 East, Roosevelt County.

Sections 1 and 12 referred to above comprise a Permanent Spacing Unit (“PSU”) for purposes of Bakken/Three Forks Formation oil production pursuant to Board Order No. 239-2014.

Sections 25 and 36 referred to above comprise a Temporary Spacing Unit (“TSU”) for purposes of Bakken/Three Forks Formation production pursuant to Board Order No. 380-2011. No Bakken/Three Forks Formation wells have been drilled with regard to Sections 25 and 36 and as a result Applicant requests Board Order No. 380-2011 be vacated.

Board Order No. 241-2014 authorized the drilling of up to three (3) additional Bakken/Three Forks Formation wells in the PSU comprised of Sections 1 and 12, which additional wells have not been drilled and as a result Applicant requests that Board Order No. 241-2012 be vacated.

2. To more efficiently and economically recover Bakken/Three Forks Formation oil reserves underlying Sections 1 and 12 and Sections 25 and 36 referred to above Applicant proposes to drill a horizontal Bakken/Three Forks Formation well in the requested OTSU, with a heel/toe setbacks of two hundred feet (200’) and lateral setbacks of five hundred feet (500’) from the requested OTSU spacing unit boundaries.

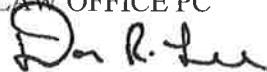
3. Applicant believes the requested two hundred feet (200') heel/toe setbacks and five hundred feet (500') lateral setbacks from the requested OTSU spacing unit boundaries are necessary in order to more adequately and efficiently increase the ultimate recovery of Bakken/Three Forks Formation oil and associated natural gas from the requested OTSU.
4. Applicant will, within ninety (90) days of successful completion of the proposed horizontal drilling operations, file an Application requesting permanent spacing and other matters relating to production from said well.
5. Applicant believes that granting of the request herein will serve to protect the correlative rights of all interested parties and will be in the best interests of prevention of waste and conservation of Bakken/Three Forks Formation oil and natural gas produced in association therewith.

WHEREFORE, Applicant requests the following:

1. This matter be set for hearing by the Board and notice thereof be given as required by law;
2. After hearing this matter the Board enter its Order vacating and rescinding Board Order Nos 380-2011 and 241-2014;
3. After hearing this matter the Board enter its Order designating and delineating Sections 1 and 12, Township 29 North, Range 58 East, and Sections 25 and 36, Township 30 North, Range 58 East, as an OTSU and authorizing Applicant to drill, complete and produce Bakken/Three Forks Formation oil and associated natural gas therefrom, provided that operations for the drilling of said well commence within one (1) year of the date of the requested Order;
4. Within ninety (90) days of first production from the requested Bakken/Three Forks Formation well Applicant shall submit an Application to the Board requesting the establishment of an Overlapping Permanent Spacing Unit therefore and the production of Bakken/Three Forks Formation oil and associated natural gas therefrom; and
5. For such other or additional relief as the Board may deem appropriate.

Dated November 6, 2025.

LEE LAW OFFICE PC



By: _____

Don R. Lee, Attorney for Applicant
Lee Law Office PC
158 Main Street – P.O. Box 790
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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 PHOENIX OPERATING LLC FOR AN
ORDER AUTHORIZING THE DRILLING
OF UP TO THREE (3) ADDITIONAL
HORIZONTAL BAKKEN/THREE FORKS
FORMATION WELLS WITHIN AND UPON
THE OVERLAPPING TEMPORARY
SPACING UNIT ("OTSU") COMPRISED OF
SECTIONS 1 & 12, TOWNSHIP 29 NORTH,
RANGE 58 EAST, AND SECTIONS 25 & 36,
TOWNSHIP 30 NORTH, RANGE 58 EAST,
ROOSEVELT COUNTY, AT ANY
LOCATIONS NOT CLOSER THAN 200'
(HEEL/TOE SETBACKS) AND 500'
(LATERAL SETBACKS) TO THE
BOUNDARIES THEREOF, AND SUCH
OTHER AND FURTHER RELIEF AS THE
BOARD MAY DEEM APPROPRIATE.**

APPLICATION

MBOGC DOCKET NO. 424 - 2025

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

Phoenix Operating LLC ("Applicant"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, presents the following Application:

1. Applicant is an oil and gas leasehold owner in, to and under all or portions of the following described lands in Roosevelt County:

Township 29 North, Range 58 East, MPM

Section 1: Lots 1, 2, 3 & 4, S½N½, S½
(All)

Section 12: All

Containing 639.88 acres

Township 30 North, Range 58 East, MPM

Section 25: All

Section 36: All

Containing 1,280.00 acres

Total containing 2,559.88 acres

2. Applicant requests from this Board an Order authorizing the drilling of and production from up to three (3) additional horizontal Bakken/Three Forks Formation wells within and upon the Overlapping Temporary Spacing Unit ("OTSU") consisting of Sections 1 and 12, Township 29 North, Range 58 East, and Sections 25 and 36, Township 30 North, Range 58 East, at any location not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks) to the exterior boundaries of said OTSU.

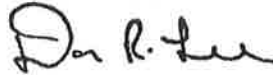
3. Applicant believes that approval and granting of the request herein will be in the best interests of prevention of waste of Bakken/Three Forks Formation oil and associated natural gas and the conservation thereof and will not adversely affect the correlative rights of any interested party.
4. In the event an authorized well is completed as a well capable of commercial production of Bakken/Three Forks Formation oil and associated natural gas, Applicant will submit within ninety (90) days of first production from any such well an Application with this Board requesting the establishment of an Overlapping Permanent Spacing Unit ("OPSU") therefore.

WHEREFORE, Applicant requests the following:

1. This matter be set for hearing by the Board and notice thereof be given as required by law;
2. After hearing this matter the Board enter its Order authorizing the Applicant to drill and produce up to three (3) additional Bakken/Three Forks Formation wells within and upon the OTSU consisting of Sections 1 and 12, Township 29 North, Range 58 East, and Sections 25 and 36, Township 30 North, Range 58 East, but not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks) to the exterior boundaries of said OTSU;
3. Within ninety (90) days of first production from any authorized Bakken/Three Forks Formation well Applicant shall submit an Application to the Board requesting the establishment of an OPSU therefore; and
4. For such other or additional relief as the Board may deem appropriate.

Dated November 6, 2025.

LEE LAW OFFICE PC



By: _____

Don R. Lee, Attorney for Applicant
Lee Law Office PC
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NOV 10 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 PHOENIX OPERATING LLC FOR AN
ORDER VACATING AND RESCINDING
BOARD ORDER NOS. 119-2011 & 55-2011
AND ADDITIONALLY DESIGNATING AND
DELINEATING A TEMPORARY SPACING
UNIT CONSISTING OF SECTIONS 6, 7, 18
& 19, TOWNSHIP 27 NORTH, RANGE 56
EAST, RICHLAND AND ROOSEVELT
COUNTIES, AND AUTHORIZING THE
DRILLING OF AND PRODUCTION FROM
A HORIZONTAL BAKKEN/THREE FORKS
FORMATION WELL WITHIN AND UPON
THE REQUESTED TEMPORARY SPACING
UNIT AT ANY LOCATION NOT CLOSER
THAN 200' TO THE HEEL/TOE SETBACKS
AND 500' TO THE LATERAL SETBACKS
OF THE REQUESTED TEMPORARY
SPACING UNIT.**

APPLICATION

MBOGC DOCKET NO. 425 - 2025

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NOV 10 2025

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

Phoenix Operating LLC ("Applicant"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, presents the following Application:

1. Applicant is the owner of oil and gas leasehold interests in, to and under the following described lands in Richland and Roosevelt Counties:

Township 27 North, Range 56 East, MPM

Section 06: All

Section 07: All

Section 18: All

Section 19: All

Containing 2,560 acres, more or less

2. Pursuant to Board Order No. 119-2011, dated April 28, 2011, this Board designated all of Sections 6 and 7, Township 27 North, Range 56 East, as a temporary spacing unit for the drilling of a Bakken Formation horizontal well. The proposed well the subject of the foregoing Order was never drilled nor has said Order been vacated by this Board and for good cause Applicant requests this Order be vacated and rescinded.
3. Pursuant to Board Order No. 55-2011, dated February 10, 2011, this Board designated all of Sections 18 and 19, Township 27 North, Range 56 East, as a temporary spacing unit for the drilling of a Bakken Formation horizontal well. The proposed well the subject of the foregoing Order was never drilled nor has said Order been vacated by this Board and for good cause Applicant requests this Order be vacated and rescinded.

4. Applicant desires to drill a horizontal Bakken/Three Forks Formation well within and upon Sections 6, 7, 18 and 19, Township 27 North, Range 56 East, and in order to more efficiently and economically recover Bakken/Three Forks oil and associated natural gas therefrom believes the temporary spacing unit therefore should consist of all of Sections 6, 7, 18 and 19, Township 27 North, Range 56 East, containing 2,560 acres.
5. Applicant believes the requested 200' heel/toe setbacks and 500' lateral setbacks from the requested spacing unit boundaries are necessary in order to adequately and efficiently increase the ultimate recovery of Bakken/Three Forks Formation oil and associated natural gas from the requested temporary spacing unit.
6. In the event Applicant's proposed horizontal Bakken/Three Forks Formation well referred to above is authorized by this Board and thereafter drilled and completed as a well capable of commercial production of Bakken/Three Forks Formation oil and associated natural gas, within ninety (90) days of such completion Applicant will file an appropriate Application with this Board requesting a permanent spacing unit for said well and Bakken/Three Forks Formation oil and associated natural gas produced therefrom.
7. Applicant believes that granting of the requests herein will serve to protect the correlative rights of all interested parties and will be in the best interest of prevention of waste and conservation of Bakken/Three Forks Formation oil and natural gas produced in association therewith.

WHEREFORE, Applicant requests the following:

1. This matter be set for hearing by the Board and notice thereof be given as required by law;
2. After hearing this matter the Board enter its Order vacating and rescinding Board Order Nos. 119-2011 and 55-2011 and terminating the temporary spacing units created thereby;
3. After hearing this matter the Board enter its Order designating Sections 6, 7, 18 and 19, Township 27 North, Range 56 East, as a temporary spacing unit and authorizing Applicant to drill, complete and produce Bakken/Three Forks Formation oil and associated natural gas therefrom, provided that operations for the drilling of said well must commence within one (1) year of the date of the requested Order;
4. Within ninety (90) days of first production from the requested authorized Bakken/Three Forks Formation well Applicant shall submit an Application to the Board requesting the establishment of a permanent spacing unit therefore and the production of Bakken/Three Forks Formation oil and associated natural gas therefrom; and
5. For such other or additional relief as the Board may deem appropriate.

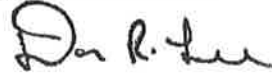
Dated November 6, 2025.

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MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

LEE LAW OFFICE PC



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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 PHOENIX OPERATING LLC FOR AN
ORDER AUTHORIZING THE DRILLING
OF UP TO THREE (3) ADDITIONAL
HORIZONTAL BAKKEN/THREE FORKS
FORMATION WELLS WITHIN AND UPON
THE TEMPORARY SPACING UNIT
COMPRISED OF ALL OF SECTIONS 6, 7, 18
& 19, TOWNSHIP 27 NORTH, RANGE 56
EAST, RICHLAND AND ROOSEVELT
COUNTIES, AT ANY LOCATIONS NOT
CLOSER THAN 200' (HEEL/TOE
SETBACKS) AND 500' (LATERAL
SETBACKS) TO THE BOUNDARIES
THEREOF, AND SUCH OTHER AND
FURTHER RELIEF AS THE BOARD MAY
DEEM APPROPRIATE.**

APPLICATION

MBOGC DOCKET NO. 426-2025

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NOV 10 2025

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

Phoenix Operating LLC ("Applicant"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, presents the following Application:

1. Applicant is the owner of oil and gas leasehold interests in, to and under the following described lands in Richland and Roosevelt Counties:

Township 27 North, Range 56 East, MPM

Section 06: All

Section 07: All

Section 18: All

Section 19: All

Containing 2,560 acres, more or less

2. Applicant requests an Order from this Board authorizing the drilling of and production of up to three (3) additional horizontal Bakken/Three Forks Formation wells within and upon the temporary spacing unit comprised of Sections 6, 7, 18 and 19, Township 27 North, Range 56 East, at any location not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks) to the exterior boundaries of said temporary spacing unit.
3. Applicant believes that approval and granting of the request herein will be in the best interest of prevention of waste of oil and associated natural gas and the conservation thereof and will not adversely affect the correlative rights of any interested party.
4. In the event an authorized well is completed as a well capable of commercial production of Bakken/Three Forks Formation oil and associated natural gas, Applicant will submit within ninety

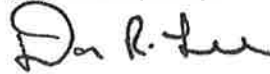
(90) days of first production from any such well an Application with this Board requesting the establishment of a permanent spacing unit therefore.

WHEREFORE, Applicant requests the following:

1. This matter be set for hearing by this Board and notice thereof be given as required by law;
2. After hearing this matter this Board enter its Order authorizing the Applicant to drill up to three (3) additional Bakken/Three Forks Formation wells within and upon the temporary spacing unit consisting of Sections 6, 7, 18 and 19, Township 27 North, Range 56 East, but not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks) to the exterior boundaries of said temporary spacing unit;
3. Within ninety (90) days of first production from any authorized Bakken/Three Forks Formation well Applicant shall submit an Application to this Board requesting the establishment of a permanent spacing unit therefore; and
4. For such other or additional relief as this Board may deem appropriate.

Dated November 6, 2025.

LEE LAW OFFICE PC



By: _____

Don R. Lee, Attorney for Applicant
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NOV 10 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 PHOENIX OPERATING LLC FOR AN
ORDER VACATING AND RESCINDING
BOARD ORDER NOS. 131-2025 & 132-2025
AND ADDITIONALLY DESIGNATING AND
DELINEATING A TEMPORARY SPACING
UNIT CONSISTING OF SECTIONS 30 & 31,
TOWNSHIP 27 NORTH, RANGE 56 EAST,
AND SECTIONS 6 AND 7, TOWNSHIP 26
NORTH, RANGE 56 EAST, RICHLAND
COUNTY, AND AUTHORIZING THE
DRILLING OF AND PRODUCTION FROM
A HORIZONTAL BAKKEN/THREE FORKS
FORMATION WELL WITHIN AND UPON
THE REQUESTED TEMPORARY SPACING
UNIT AT ANY LOCATION NOT CLOSER
THAN 200' TO THE HEEL/TOE SETBACKS
AND 500' TO THE LATERAL SETBACKS
OF THE REQUESTED TEMPORARY
SPACING UNIT.**

APPLICATION

MBOGC DOCKET NO. 427 - 2025

Phoenix Operating LLC ("Applicant"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, presents the following Application:

1. Applicant is the owner of oil and gas leasehold interests in, to and under the following described lands in Richland County:

Township 26 North, Range 56 East, MPM

Section 6: Lots 1, 2, 3, 4, 5, 6 & 7,

S $\frac{1}{2}$ NE $\frac{1}{4}$, SE $\frac{1}{4}$ NW $\frac{1}{4}$, SE $\frac{1}{4}$, E $\frac{1}{2}$ SW $\frac{1}{4}$

Section 7: Lots 1, 2, 3 & 4, E $\frac{1}{2}$ W $\frac{1}{2}$, E $\frac{1}{2}$ (All)

Township 27 North, Range 56 East, MPM

Section 30: Lots 1, 2, 3 & 4, E $\frac{1}{2}$ W $\frac{1}{2}$, E $\frac{1}{2}$ (All)

Section 31: Lots 1, 2, 3 & 4, E $\frac{1}{2}$ W $\frac{1}{2}$, E $\frac{1}{2}$ (All)

Containing 2,531.16 acres, more or less

2. Pursuant to Board Order No. 131-2025, dated June 12, 2025, this Board designated all of Sections 6 and 7, Township 26 North, Range 56 East, and all of Section 31, Township 27 North, Range 56 East, as a temporary spacing unit for the drilling of a Bakken Formation horizontal well. The proposed well the subject of the foregoing Order was never drilled nor has said Order been vacated by this Board and for good cause Applicant requests this Order be vacated and rescinded.

3. Pursuant to Board Order No. 132-2025, dated June 12, 2025, this Board authorized the drilling of up to three (3) additional horizontal Bakken/Three Forks Formation wells anywhere within the temporary spacing unit comprised of Sections 6 and 7, Township 26 North, Range 56 East and Section 31, Township 27 North, Range 56 East. The proposed wells the subject of the foregoing Order were never drilled nor has said Order been vacated by this Board and for good cause Applicant requests the foregoing Order be vacated and rescinded.
4. Applicant desires to drill a horizontal Bakken/Three Forks Formation well within and upon Sections 30 and 31, Township 27 North, Range 56 East, and Sections 6 and 7, Township 26 North, Range 56 East, and in order to more efficiently and economically recover Bakken/Three Forks oil and associated natural gas therefrom believes the temporary spacing unit therefore should consist of all of Sections 30 and 31, Township 27 North, Range 56 East, and Sections 6 and 7, Township 26 North, Range 56 East, containing 2,531.16 acres.
5. Applicant believes the requested 200' heel/toe setbacks and 500' lateral setbacks from the requested spacing unit boundaries are necessary in order to adequately and efficiently increase the ultimate recovery of Bakken/Three Forks Formation oil and associated natural gas from the requested temporary spacing unit.
6. In the event Applicant's proposed horizontal Bakken/Three Forks Formation well referred to above is authorized by this Board and thereafter drilled and completed as a well capable of commercial production of Bakken/Three Forks Formation oil and associated natural gas, within ninety (90) days of such completion Applicant will file an appropriate Application with this Board requesting a permanent spacing unit for said well and Bakken/Three Forks Formation oil and associated natural gas produced therefrom.
7. Applicant believes that granting of the requests herein will serve to protect the correlative rights of all interested parties and will be in the best interest of prevention of waste and conservation of Bakken/Three Forks Formation oil and natural gas produced in association therewith.

WHEREFORE, Applicant requests the following:

1. This matter be set for hearing by the Board and notice thereof be given as required by law;
2. After hearing this matter the Board enter its Order vacating and rescinding Board Order Nos. 131-2025 and 132-2025 and terminating the temporary spacing units created thereby and ~~authorizing of the drilling of up to three (3) additional Bakken/Three Forks Formation wells;~~
3. After hearing this matter the Board enter its Order designating Sections 30 and 31, Township 27 North, Range 56 East, and Sections 6 and 7, Township 26 North, Range 56 East, as a temporary spacing unit and authorizing Applicant to drill, complete and produce Bakken/Three Forks Formation oil and associated natural gas therefrom, provided that operations for the drilling of said well must commence within one (1) year of the date of the requested Order;

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

**IN THE MATTER OF THE APPLICATION
OF PHOENIX OPERATING LLC FOR AN
ORDER AUTHORIZING THE DRILLING
OF UP TO THREE (3) ADDITIONAL
HORIZONTAL BAKKEN/THREE FORKS
FORMATION WELLS WITHIN AND UPON
THE TEMPORARY SPACING UNIT
COMPRISED OF ALL OF SECTIONS 30 &
31, TOWNSHIP 27 NORTH, RANGE 56
EAST, AND SECTIONS 6 AND 7,
TOWNSHIP 26 NORTH, RANGE 56 EAST,
RICHLAND COUNTY, AT ANY
LOCATIONS NOT CLOSER THAN 200'
(HEEL/TOE SETBACKS) AND 500'
(LATERAL SETBACKS) TO THE
BOUNDARIES THEREOF, AND SUCH
OTHER AND FURTHER RELIEF AS THE
BOARD MAY DEEM APPROPRIATE.**

APPLICATION

MBOGC DOCKET NO. 428-2025

Phoenix Operating LLC ("Applicant"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, presents the following Application:

1. Applicant is the owner of oil and gas leasehold interests in, to and under the following described lands in Richland County:

Township 26 North, Range 56 East, MPM

Section 6: Lots 1, 2, 3, 4, 5, 6 & 7,

S $\frac{1}{2}$ NE $\frac{1}{4}$, SE $\frac{1}{4}$ NW $\frac{1}{4}$, SE $\frac{1}{4}$, E $\frac{1}{2}$ SW $\frac{1}{4}$

Section 7: Lots 1, 2, 3 & 4, E $\frac{1}{2}$ W $\frac{1}{2}$, E $\frac{1}{2}$ (All)

Township 27 North, Range 56 East, MPM

Section 30: Lots 1, 2, 3 & 4, E $\frac{1}{2}$ W $\frac{1}{2}$, E $\frac{1}{2}$ (All)

Section 31: Lots 1, 2, 3 & 4, E $\frac{1}{2}$ W $\frac{1}{2}$, E $\frac{1}{2}$ (All)

Containing 2,531.16 acres, more or less

2. Applicant requests an Order from this Board authorizing the drilling of and production of up to three (3) additional horizontal Bakken/Three Forks Formation wells within and upon the temporary spacing unit comprised of Sections 30 and 31, Township 27 North, Range 56 East, and Sections 6 and 7, Township 26 North, Range 56 East, at any location not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks) to the exterior boundaries of said temporary spacing unit.

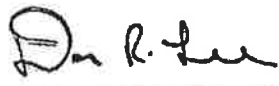
3. Applicant believes that approval and granting of the request herein will be in the best interest of prevention of waste of oil and associated natural gas and the conservation thereof and will not adversely affect the correlative rights of any interested party.
4. In the event an authorized well is completed as a well capable of commercial production of Bakken/Three Forks Formation oil and associated natural gas, Applicant will submit within ninety (90) days of first production from any such well an Application with this Board requesting the establishment of a permanent spacing unit therefore.

WHEREFORE, Applicant requests the following:

1. This matter be set for hearing by this Board and notice thereof be given as required by law;
2. After hearing this matter this Board enter its Order authorizing the Applicant to drill up to three (3) additional Bakken/Three Forks Formation wells within and upon the temporary spacing unit consisting of Sections 30 and 31, Township 27 North, Range 56 East, and Sections 6 and 7, Township 26 North, Range 56 East, but not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks) to the exterior boundaries of said temporary spacing unit;
3. Within ninety (90) days of first production from any authorized Bakken/Three Forks Formation well Applicant shall submit an Application to this Board requesting the establishment of a permanent spacing unit therefore; and
4. For such other or additional relief as this Board may deem appropriate.

Dated November 6, 2025.

LEE LAW OFFICE PC

By: 
Don R. Lee, Attorney for Applicant
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**BEFORE THE BOARD OF OIL AND GAS CONSERVATION
OF THE STATE OF MONTANA**

**IN THE MATTER OF THE APPLICATION
OF PHOENIX OPERATING LLC FOR AN
ORDER VACATING AND RESCINDING
BOARD ORDER NOS. 129-2025, 130-2025 &
132-2025 AND ADDITIONALLY
DESIGNATING AND DELINEATING A
TEMPORARY SPACING UNIT
CONSISTING OF SECTIONS 18, 19 & 30,
TOWNSHIP 26 NORTH, RANGE 56 EAST,
RICHLAND COUNTY, AND AUTHORIZING
THE DRILLING OF AND PRODUCTION
FROM A HORIZONTAL BAKKEN/THREE
FORKS FORMATION WELL WITHIN AND
UPON THE REQUESTED TEMPORARY
SPACING UNIT AT ANY LOCATION NOT
CLOSER THAN 200' TO THE HEEL/TOE
SETBACKS AND 500' TO THE LATERAL
SETBACKS OF THE REQUESTED
TEMPORARY SPACING UNIT.**

APPLICATION

MBOGC DOCKET NO. 429 - 2025

RECEIVED

NOV 10 2025

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

Phoenix Operating LLC ("Applicant"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, presents the following Application:

1. Applicant is the owner of oil and gas leasehold interests in, to and under the following described lands in Richland County:

Township 26 North, Range 56 East, MPM

Section 18: Lots 1, 2, 3 & 4, E½W½, E½ (All)

Section 19: Lots 1, 2, 3 & 4, E½W½, E½ (All)

Section 30: Lots 1, 2, 3 & 4, E½W½, E½ (All)

Containing 1,902.17 acres, more or less

2. Pursuant to Board Order No. 129-2025, dated June 12, 2025, this Board designated all of Sections 19, 30 and 31, Township 26 North, Range 56 East, as a temporary spacing unit for the drilling of a Bakken Formation horizontal well. The proposed well the subject of the foregoing Order was never drilled nor has said Order been vacated by this Board and for good cause Applicant requests this Order be vacated and rescinded.
3. Pursuant to Board Order No. 130-2025, dated June 12, 2025, this Board authorized the drilling of up to three (3) additional horizontal Bakken/Three Forks Formation wells anywhere within the temporary spacing unit comprised of Sections 19, 30 and 31, Township 26 North, Range 56 East. The proposed wells the subject of the foregoing Order were never drilled nor has said Order been vacated by this Board and for good cause Applicant requests the foregoing Order be vacated and rescinded.

4. Pursuant to Board Order No. 131-2025, dated June 12, 2025, this Board designated all of Sections 6, 7 and 18, Township 26 North, Range 56 East, as a temporary spacing unit for the drilling of a Bakken/Three Forks Formation horizontal well. The proposed well the subject of the foregoing Order was never drilled nor has said Order been vacated by this Board and for good cause Applicant requests this Order be vacated and rescinded.
5. Pursuant to Board Order No. 132-2025, dated June 12, 2025, this Board authorized the drilling of up to three (3) additional horizontal Bakken/Three Forks Formation wells anywhere within the temporary spacing unit comprised of Sections 6, 7 and 18, Township 26 North, Range 56 East, and Section 31, Township 27 North, Range 56 East. The proposed wells the subject of the foregoing Order were never drilled nor has said Order been vacated by this Board and for good cause Applicant requests the foregoing Order be vacated and rescinded.
6. Applicant desires to drill a horizontal Bakken/Three Forks Formation well within and upon Sections 18, 19 and 30, Township 26 North, Range 56 East, and in order to more efficiently and economically recover Bakken/Three Forks oil and associated natural gas therefrom believes the temporary spacing unit therefore should consist of all of Sections 18, 19 and 30, Township 26 North, Range 56 East, containing 1,902.17 acres.
7. Applicant believes the requested 200' heel/toe setbacks and 500' lateral setbacks from the requested spacing unit boundaries are necessary in order to adequately and efficiently increase the ultimate recovery of Bakken/Three Forks Formation oil and associated natural gas from the requested temporary spacing unit.
8. In the event Applicant's proposed horizontal Bakken/Three Forks Formation well referred to above is authorized by this Board and thereafter drilled and completed as a well capable of commercial production of Bakken/Three Forks Formation oil and associated natural gas, within ninety (90) days of such completion Applicant will file an appropriate Application with this Board requesting a permanent spacing unit for said well and Bakken/Three Forks Formation oil and associated natural gas produced therefrom.
9. Applicant believes that granting of the requests herein will serve to protect the correlative rights of all interested parties and will be in the best interest of prevention of waste and conservation of Bakken/Three Forks Formation oil and natural gas produced in association therewith.

WHEREFORE, Applicant requests the following:

1. This matter be set for hearing by the Board and notice thereof be given as required by law;
2. After hearing this matter the Board enter its Order vacating and rescinding Board Order Nos. 129-2025, 130-2025, 131-2025 and 132-2025 and terminating the temporary spacing units created thereby and authorizing of the drilling of up to three (3) additional Bakken/Three Formation wells;
3. After hearing this matter the Board enter its Order designating Sections 18, 19 and 30, Township 26 North, Range 56 East, as a temporary spacing unit and authorizing Applicant to drill, complete and produce Bakken/Three Forks Formation oil and associated natural gas therefrom, provided that operations for the drilling of said well must commence within one (1) year of the date of the requested Order;

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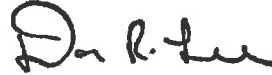
NOV 10 2025

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLING

4. Within ninety (90) days of first production from the requested authorized Bakken/Three Forks Formation well Applicant shall submit an Application to the Board requesting the establishment of a permanent spacing unit therefore and the production of Bakken/Three Forks Formation oil and associated natural gas therefrom; and
5. For such other or additional relief as the Board may deem appropriate.

Dated November 6, 2025.

LEE LAW OFFICE PC



By: _____

Don R. Lee, Attorney for Applicant
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RECEIVED

NOV 10 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 PHOENIX OPERATING LLC FOR AN
ORDER AUTHORIZING THE DRILLING
OF UP TO THREE (3) ADDITIONAL
HORIZONTAL BAKKEN/THREE FORKS
FORMATION WELLS WITHIN AND UPON
THE TEMPORARY SPACING UNIT
COMPRISED OF ALL OF SECTIONS 18, 19
& 30, TOWNSHIP 26 NORTH, RANGE 56
EAST, RICHLAND COUNTY, AT ANY
LOCATIONS NOT CLOSER THAN 200'
(HEEL/TOE SETBACKS) AND 500'
(LATERAL SETBACKS) TO THE
BOUNDARIES THEREOF, AND SUCH
OTHER AND FURTHER RELIEF AS THE
BOARD MAY DEEM APPROPRIATE.**

APPLICATION

MBOGC DOCKET NO. 430-2025

Phoenix Operating LLC ("Applicant"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, presents the following Application:

1. Applicant is the owner of oil and gas leasehold interests in, to and under the following described lands in Richland County:

Township 26 North, Range 56 East, MPM

Section 18: Lots 1, 2, 3 & 4, E½W½, E½ (All)

Section 19: Lots 1, 2, 3 & 4, E½W½, E½ (All)

Section 30: Lots 1, 2, 3 & 4, E½W½, E½ (All)

Containing 1,902.17 acres, more or less

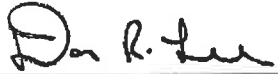
2. Applicant requests an Order from this Board authorizing the drilling of and production of up to three (3) additional horizontal Bakken/Three Forks Formation wells within and upon the temporary spacing unit comprised of Sections 18, 19 and 30, Township 26 North, Range 56 East, at any location not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks) to the exterior boundaries of said temporary spacing unit.
3. Applicant believes that approval and granting of the request herein will be in the best interest of prevention of waste of oil and associated natural gas and the conservation thereof and will not adversely affect the correlative rights of any interested party.
4. In the event an authorized well is completed as a well capable of commercial production of Bakken/Three Forks Formation oil and associated natural gas, Applicant will submit within ninety (90) days of first production from any such well an Application with this Board requesting the establishment of a permanent spacing unit therefore.

WHEREFORE, Applicant requests the following:

1. This matter be set for hearing by this Board and notice thereof be given as required by law;
2. After hearing this matter this Board enter its Order authorizing the Applicant to drill up to three (3) additional Bakken/Three Forks Formation wells within and upon the temporary spacing unit consisting of Sections 18, 19 and 30, Township 26 North, Range 56 East, but not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks) to the exterior boundaries of said temporary spacing unit;
3. Within ninety (90) days of first production from any authorized Bakken/Three Forks Formation well Applicant shall submit an Application to this Board requesting the establishment of a permanent spacing unit therefore; and
4. For such other or additional relief as this Board may deem appropriate.

Dated November 6, 2025.

LEE LAW OFFICE PC

By: 
Don R. Lee, Attorney for Applicant
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Facsimile: (406) 434-5246
Email: don@leelawofficepc.com

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

**IN THE MATTER OF THE APPLICATION
OF PHOENIX OPERATING LLC FOR AN
ORDER VACATING AND RESCINDING
BOARD ORDER NOS. 131-2025 & 132-2025
AND ADDITIONALLY DESIGNATING AND
DELINEATING A TEMPORARY SPACING
UNIT CONSISTING OF SECTIONS 6 AND 7,
TOWNSHIP 25 NORTH, RANGE 56 EAST,
AND SECTION 31, TOWNSHIP 26 NORTH,
RANGE 56 EAST, AND RICHLAND
COUNTY, AND AUTHORIZING THE
DRILLING OF AND PRODUCTION FROM
A HORIZONTAL BAKKEN/THREE FORKS
FORMATION WELL WITHIN AND UPON
THE REQUESTED TEMPORARY SPACING
UNIT AT ANY LOCATION NOT CLOSER
THAN 200' TO THE HEEL/TOE SETBACKS
AND 500' TO THE LATERAL SETBACKS
OF THE REQUESTED TEMPORARY
SPACING UNIT.**

APPLICATION

MBOGC DOCKET NO. 431 - 2025

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NOV 10 2025

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

Phoenix Operating LLC ("Applicant"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, presents the following Application:

1. Applicant is the owner of oil and gas leasehold interests in, to and under the following described lands in Richland County:

Township 25 North, Range 56 East, MPM

Section 6: Lots 1, 2, 3, 4, 5, 6 & 7,

S $\frac{1}{2}$ NE $\frac{1}{4}$, SE $\frac{1}{4}$ NW $\frac{1}{4}$, SE $\frac{1}{4}$, E $\frac{1}{2}$ SW $\frac{1}{4}$

Section 7: Lots 1, 2, 3 & 4, E $\frac{1}{2}$ W $\frac{1}{2}$, E $\frac{1}{2}$ (All)

Township 26 North, Range 56 East, MPM

Section 31: Lots 1, 2, 3 & 4, E $\frac{1}{2}$ W $\frac{1}{2}$, E $\frac{1}{2}$ (All)

Containing 1,904.89 acres, more or less

2. Pursuant to Board Order No. 119-2006, dated March 30, 2006, this Board designated all of Sections 6 and 7, Township 25 North, Range 56 East, as a temporary spacing unit for the drilling of a multilateral horizontal well in the Bakken Formation. The proposed well the subject of the foregoing Order was never drilled nor has said Order been vacated by this Board and for good cause Applicant requests this Order be vacated and rescinded.

3. Pursuant to Board Order No. 362-2011, dated October 13, 2011, this Board designated all of Sections 30 and 31, Township 26 North, Range 56 East, as a temporary spacing unit for the drilling of a multilateral horizontal well in the Bakken/Three Forks Formation. The proposed well the subject of the foregoing Order was never drilled nor has said Order been vacated by this Board and for good cause Applicant requests this Order be vacated and rescinded.
4. Pursuant to Board Order No. 129-2025, dated June 12, 2025, this Board designated all of Sections 19, 20, and 31, Township 26 North, Range 56 East, as a temporary spacing unit for the drilling of a horizontal well in the Bakken/Three Forks Formation. The proposed well the subject of the foregoing Order was never drilled nor has said Order been vacated by this Board and for good cause Applicant requests this Order be vacated and rescinded.
5. Pursuant to Board Order No. 130-2025, dated June 12, 2025, this Board authorized the drilling of up to three (3) additional horizontal Bakken/Three Forks Formation wells anywhere within the temporary spacing unit comprised of Sections 19, 30 and 31, Township 26 North, Range 56 East. The proposed wells the subject of the foregoing Order were never drilled nor has said Order been vacated by this Board and for good cause Applicant requests the foregoing Order be vacated and rescinded.
6. Applicant desires to drill a horizontal Bakken/Three Forks Formation well within and upon Sections 6 and 7, Township 25 North, Range 56 East, and Section 31, Township 26 North, Range 56 East, and in order to more efficiently and economically recover Bakken/Three Forks oil and associated natural gas therefrom believes the temporary spacing unit therefore should consist of all of Sections 6 and 7, Township 25 North, Range 56 East, and Section 31, Township 26 North, Range 56 East, containing 1,904.89 acres.
7. Applicant believes the requested 200' heel/toe setbacks and 500' lateral setbacks from the requested spacing unit boundaries are necessary in order to adequately and efficiently increase the ultimate recovery of Bakken/Three Forks Formation oil and associated natural gas from the requested temporary spacing unit.
8. In the event Applicant's proposed horizontal Bakken/Three Forks Formation well referred to above is authorized by this Board and thereafter drilled and completed as a well capable of commercial production of Bakken/Three Forks Formation oil and associated natural gas, within ninety (90) days of such completion Applicant will file an appropriate Application with this Board requesting a permanent spacing unit for said well and Bakken/Three Forks Formation oil and associated natural gas produced therefrom.
9. Applicant believes that granting of the requests herein will serve to protect the correlative rights of all interested parties and will be in the best interest of prevention of waste and conservation of Bakken/Three Forks Formation oil and natural gas produced in association therewith.

WHEREFORE, Applicant requests the following:

1. This matter be set for hearing by the Board and notice thereof be given as required by law;
2. After hearing this matter the Board enter its Order vacating and rescinding Board Order Nos. 119-2006, 362-2011, 129-2025 and 130-2025 and terminating the temporary spacing units created thereby and authorizing of

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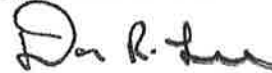
MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

the drilling of up to three (3) additional Bakken/Three Forks Formation wells;

3. After hearing this matter the Board enter its Order designating Sections 6 and 7, Township 25 North, Range 56 East, and Section 31, Township 26 North, Range 56 East, as a temporary spacing unit and authorizing Applicant to drill, complete and produce Bakken/Three Forks Formation oil and associated natural gas therefrom, provided that operations for the drilling of said well must commence within one (1) year of the date of the requested Order;
4. Within ninety (90) days of first production from the requested authorized Bakken/Three Forks Formation well Applicant shall submit an Application to the Board requesting the establishment of a permanent spacing unit therefore and the production of Bakken/Three Forks Formation oil and associated natural gas therefrom; and
5. For such other or additional relief as the Board may deem appropriate.

Dated November 6, 2025.

LEE LAW OFFICE PC



By: _____

Don R. Lee, Attorney for Applicant
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NOV 10 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 PHOENIX OPERATING LLC FOR AN
ORDER AUTHORIZING THE DRILLING
OF UP TO THREE (3) ADDITIONAL
HORIZONTAL BAKKEN/THREE FORKS
FORMATION WELLS WITHIN AND UPON
THE TEMPORARY SPACING UNIT
COMPRISED OF ALL OF SECTIONS 6 & 7,
TOWNSHIP 25 NORTH, RANGE 56 EAST,
AND SECTION 31, TOWNSHIP 26 NORTH,
RANGE 56 EAST, RICHLAND COUNTY, AT
ANY LOCATIONS NOT CLOSER THAN
200' (HEEL/TOE SETBACKS) AND 500'
(LATERAL SETBACKS) TO THE
BOUNDARIES THEREOF, AND SUCH
OTHER AND FURTHER RELIEF AS THE
BOARD MAY DEEM APPROPRIATE.**

APPLICATION

MBOGC DOCKET NO. 432-2025

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NOV 10 2025

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

Phoenix Operating LLC ("Applicant"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, presents the following Application:

1. Applicant is the owner of oil and gas leasehold interests in, to and under the following described lands in Richland County:

Township 25 North, Range 56 East, MPM

Section 6: Lots 1, 2, 3, 4, 5, 6 & 7,
S $\frac{1}{2}$ NE $\frac{1}{4}$, SE $\frac{1}{4}$ NW $\frac{1}{4}$, SE $\frac{1}{4}$, E $\frac{1}{2}$ SW $\frac{1}{4}$

Section 7: Lots 1, 2, 3 & 4, E $\frac{1}{2}$ W $\frac{1}{2}$, E $\frac{1}{2}$ (All)

Township 26 North, Range 56 East, MPM

Section 31: Lots 1, 2, 3 & 4, E $\frac{1}{2}$ W $\frac{1}{2}$, E $\frac{1}{2}$ (All)
Containing 1,904.89 acres, more or less

2. Applicant requests an Order from this Board authorizing the drilling of and production of up to three (3) additional horizontal Bakken/Three Forks Formation wells within and upon the temporary spacing unit comprised of Sections 6 and 7, Township 25 North, Range 56 East, and Section 31, Township 26 North, Range 56 East, and at any location not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks) to the exterior boundaries of said temporary spacing unit.
3. Applicant believes that approval and granting of the request herein will be in the best interest of prevention of waste of oil and associated natural gas and the conservation thereof and will not adversely affect the correlative rights of any interested party.

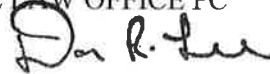
4. In the event an authorized well is completed as a well capable of commercial production of Bakken/Three Forks Formation oil and associated natural gas, Applicant will submit within ninety (90) days of first production from any such well an Application with this Board requesting the establishment of a permanent spacing unit therefore.

WHEREFORE, Applicant requests the following:

1. This matter be set for hearing by this Board and notice thereof be given as required by law;
2. After hearing this matter this Board enter its Order authorizing the Applicant to drill up to three (3) additional Bakken/Three Forks Formation wells within and upon the temporary spacing unit consisting of Sections 6 and 7, Township 25 North, Range 56 East, and Section 31, Township 26 North, Range 56 East, but not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks) to the exterior boundaries of said temporary spacing unit;
3. Within ninety (90) days of first production from any authorized Bakken/Three Forks Formation well Applicant shall submit an Application to this Board requesting the establishment of a permanent spacing unit therefore; and
4. For such other or additional relief as this Board may deem appropriate.

Dated November 6, 2025.

LEE LAW OFFICE PC



By: _____

Don R. Lee, Attorney for Applicant
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NOV 10 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 PHOENIX OPERATING LLC FOR AN
ORDER VACATING AND RESCINDING
BOARD ORDER NOS. 202-2010 & 166-2011
AND ADDITIONALLY DESIGNATING AND
DELINEATING A TEMPORARY SPACING
UNIT CONSISTING OF SECTIONS 17, 20, 29
& 32, TOWNSHIP 26 NORTH, RANGE 56
EAST, RICHLAND COUNTY, AND
AUTHORIZING THE DRILLING OF AND
PRODUCTION FROM A HORIZONTAL
BAKKEN/THREE FORKS FORMATION
WELL WITHIN AND UPON THE
REQUESTED TEMPORARY SPACING
UNIT AT ANY LOCATION NOT CLOSER
THAN 200' TO THE HEEL/TOE SETBACKS
AND 500' TO THE LATERAL SETBACKS
OF THE REQUESTED TEMPORARY
SPACING UNIT.**

APPLICATION

MBOGC DOCKET NO. 433 - 2025

Phoenix Operating LLC ("Applicant"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, presents the following Application:

1. Applicant is the owner of oil and gas leasehold interests in, to and under the following described lands in Richland County:

Township 26 North, Range 56 East, MPM

Section 17: All

Section 20: All

Section 29: All

Section 32: All

Containing 2,560.00 acres, more or less

2. Pursuant to Amended Board Order No. 202-2010, dated October 14, 2010, this Board designated all of Sections 17 and 20, Township 26 North, Range 56 East, as a temporary spacing unit for the drilling of a Middle Bakken and Three Forks Formation horizontal well. The proposed well the subject of the foregoing Order was never drilled nor has said Order been vacated by this Board and for good cause Applicant requests this Order be vacated and rescinded.
3. Pursuant to Board Order No. 166-2011, dated June 16, 2011, this Board amended Board Order No. 202-2010 amending the authorization of drilling of horizontal Bakken/Three Forks Formation wells anywhere within the spacing unit designated all of Sections 17 and 20, Township 26 North, Range 56 East as but not closer than 200' (heel/toe setback) boundaries and 1320' (lateral setback) to the boundaries thereof. The proposed well the subject of the foregoing Order was never drilled

nor has said Order been vacated by this Board and for good cause Applicant requests this Order be vacated and rescinded.

4. Applicant desires to drill a horizontal Bakken/Three Forks Formation well within and upon Sections 17, 20, 29 and 32, Township 26 North, Range 56 East, and in order to more efficiently and economically recover Bakken/Three Forks oil and associated natural gas therefrom believes the temporary spacing unit therefore should consist of all of Sections 17, 20, 29 and 32, Township 26 North, Range 56 East, containing 2,560.00 acres.
5. Applicant believes the requested 200' heel/toe setbacks and 500' lateral setbacks from the requested spacing unit boundaries are necessary in order to adequately and efficiently increase the ultimate recovery of Bakken/Three Forks Formation oil and associated natural gas from the requested temporary spacing unit.
6. In the event Applicant's proposed horizontal Bakken/Three Forks Formation well referred to above is authorized by this Board and thereafter drilled and completed as a well capable of commercial production of Bakken/Three Forks Formation oil and associated natural gas, within ninety (90) days of such completion Applicant will file an appropriate Application with this Board requesting a permanent spacing unit for said well and Bakken/Three Forks Formation oil and associated natural gas produced therefrom.
7. Applicant believes that granting of the requests herein will serve to protect the correlative rights of all interested parties and will be in the best interest of prevention of waste and conservation of Bakken/Three Forks Formation oil and natural gas produced in association therewith.

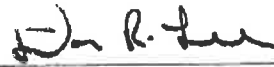
WHEREFORE, Applicant requests the following:

1. This matter be set for hearing by the Board and notice thereof be given as required by law;
2. After hearing this matter the Board enter its Order vacating and rescinding Board Order Nos. 202-2010 and 166-2011 and terminating the temporary spacing units created thereby;
3. After hearing this matter the Board enter its Order designating Sections 17, 20, 29 and 32, Township 26 North, Range 56 East, as a temporary spacing unit and authorizing Applicant to drill, complete and produce Bakken/Three Forks Formation oil and associated natural gas therefrom, provided that operations for the drilling of said well must commence within one (1) year of the date of the requested Order;
4. Within ninety (90) days of first production from the requested authorized Bakken/Three Forks Formation well Applicant shall submit an Application to the Board requesting the establishment of a permanent spacing unit therefore and the production of Bakken/Three Forks Formation oil and associated natural gas therefrom; and

5. For such other or additional relief as the Board may deem appropriate.

Dated November 6, 2025.

LEE LAW OFFICE PC

By: 

Don R. Lee, Attorney for Applicant
Lee Law Office PC
158 Main Street – P.O. Box 790
Shelby, MT 59474
Telephone: (406) 434-5244
Facsimile: (406) 434-5246
Email: don@leelawofficepc.com

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

**IN THE MATTER OF THE APPLICATION
OF PHOENIX OPERATING LLC FOR AN
ORDER AUTHORIZING THE DRILLING
OF UP TO THREE (3) ADDITIONAL
HORIZONTAL BAKKEN/THREE FORKS
FORMATION WELLS WITHIN AND UPON
THE TEMPORARY SPACING UNIT
COMPRISED OF ALL OF SECTIONS 17, 20,
29 & 32, TOWNSHIP 26 NORTH, RANGE 56
EAST, RICHLAND COUNTY, AT ANY
LOCATIONS NOT CLOSER THAN 200'
(HEEL/TOE SETBACKS) AND 500'
(LATERAL SETBACKS) TO THE
BOUNDARIES THEREOF, AND SUCH
OTHER AND FURTHER RELIEF AS THE
BOARD MAY DEEM APPROPRIATE.**

APPLICATION

MBOGC DOCKET NO. 434-2025

Phoenix Operating LLC ("Applicant"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, presents the following Application:

1. Applicant is the owner of oil and gas leasehold interests in, to and under the following described lands in Richland County:

Township 26 North, Range 56 East, MPM

Section 17: All

Section 20: All

Section 29: All

Section 32: All

Containing 2,560.00 acres, more or less

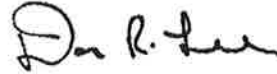
2. Applicant requests an Order from this Board authorizing the drilling of and production of up to three (3) additional horizontal Bakken/Three Forks Formation wells within and upon the temporary spacing unit comprised of Sections 17, 20, 29 and 32, Township 26 North, Range 56 East, at any location not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks) to the exterior boundaries of said temporary spacing unit.
3. Applicant believes that approval and granting of the request herein will be in the best interest of prevention of waste of oil and associated natural gas and the conservation thereof and will not adversely affect the correlative rights of any interested party.
4. In the event an authorized well is completed as a well capable of commercial production of Bakken/Three Forks Formation oil and associated natural gas, Applicant will submit within ninety (90) days of first production from any such well an Application with this Board requesting the establishment of a permanent spacing unit therefore.

WHEREFORE, Applicant requests the following:

1. This matter be set for hearing by this Board and notice thereof be given as required by law;
2. After hearing this matter this Board enter its Order authorizing the Applicant to drill up to three (3) additional Bakken/Three Forks Formation wells within and upon the temporary spacing unit consisting of Sections 17, 20, 29 and 32, Township 26 North, Range 56 East, but not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks) to the exterior boundaries of said temporary spacing unit;
3. Within ninety (90) days of first production from any authorized Bakken/Three Forks Formation well Applicant shall submit an Application to this Board requesting the establishment of a permanent spacing unit therefore; and
4. For such other or additional relief as this Board may deem appropriate.

Dated November 6, 2025.

LEE LAW OFFICE PC



By: _____

Don R. Lee, Attorney for Applicant
Lee Law Office PC
158 Main Street – P.O. Box 790
Shelby, MT 59474
Telephone: (406) 434-5244
Facsimile: (406) 434-5246
Email: don@leelawofficepc.com

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

**IN THE MATTER OF THE APPLICATION
OF PHOENIX OPERATING LLC FOR AN
ORDER VACATING AND RESCINDING
BOARD ORDER NO. 49-2025 AND
ADDITIONALLY DESIGNATING AND
DELINEATING A TEMPORARY SPACING
UNIT CONSISTING OF SECTIONS 3 AND
10, TOWNSHIP 25 NORTH, RANGE 56
EAST, AND SECTIONS 27 AND 34,
TOWNSHIP 26 NORTH, RANGE 56 EAST,
RICHLAND COUNTY, AND AUTHORIZING
THE DRILLING OF AND PRODUCTION
FROM A HORIZONTAL BAKKEN/THREE
FORKS FORMATION WELL WITHIN AND
UPON THE REQUESTED TEMPORARY
SPACING UNIT AT ANY LOCATION NOT
CLOSER THAN 200' TO THE HEEL/TOE
SETBACKS AND 500' TO THE LATERAL
SETBACKS OF THE REQUESTED
TEMPORARY SPACING UNIT.**

APPLICATION

MBOGC DOCKET NO. 435-2025

RECEIVED

NOV 10 2025

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

Phoenix Operating LLC ("Applicant"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, presents the following Application:

1. Applicant is the owner of oil and gas leasehold interests in, to and under the following described lands in Richland County:

Township 25 North, Range 56 East, MPM

Section 03: All

Section 10: All

Containing 1,280 acres, more or less

Township 26 North, Range 56 East, MPM

Section 27: All

Section 34: All

Containing 1,280 acres, more or less

2. Pursuant to Board Order No. 49-2025, dated February 20, 2025, this Board designated all of Sections 3, 10 and 15, Township 25 North, Range 56 East, as a temporary spacing unit for the drilling of a Bakken Formation horizontal well. The proposed well the subject of the foregoing Order was never drilled nor has said Order been vacated by this Board and for good cause Applicant requests this Order be vacated and rescinded.
3. Applicant desires to drill a horizontal Bakken/Three Forks Formation well within and upon Sections 3 and 10 Township 25 North, Range 56 East, and Sections 27 and 34, Township 26 North,

Range 56 East, and in order to more efficiently and economically recover Bakken/Three Forks oil and associated natural gas therefrom believes the temporary spacing unit therefore should consist of all of Sections 3 and 10, Township 25 North, Range 56 East, and Sections 27 and 34, Township 26 North, Range 56 East, containing 2,560 acres.

4. Applicant believes the requested 200' heel/toe setbacks and 500' lateral setbacks from the requested spacing unit boundaries are necessary in order to adequately and efficiently increase the ultimate recovery of Bakken/Three Forks Formation oil and associated natural gas from the requested temporary spacing unit.
5. In the event Applicant's proposed horizontal Bakken/Three Forks Formation well referred to above is authorized by this Board and thereafter drilled and completed as a well capable of commercial production of Bakken/Three Forks Formation oil and associated natural gas, within ninety (90) days of such completion Applicant will file an appropriate Application with this Board requesting a permanent spacing unit for said well and Bakken/Three Forks Formation oil and associated natural gas produced therefrom.
6. Applicant believes that granting of the requests herein will serve to protect the correlative rights of all interested parties and will be in the best interest of prevention of waste and conservation of Bakken/Three Forks Formation oil and natural gas produced in association therewith.

WHEREFORE, Applicant requests the following:

1. This matter be set for hearing by the Board and notice thereof be given as required by law;
2. After hearing this matter the Board enter its Order vacating and rescinding Board Order No. 49-2025 and terminating the temporary spacing units created thereby and authorizing of the drilling of up to three (3) additional Bakken/Three Formation wells;
3. After hearing this matter the Board enter its Order designating Sections 3 and 10, Township 25 North, Range 56 East, and Sections 27 and 34, Township 26 North, Range 56 East, as a temporary spacing unit and authorizing Applicant to drill, complete and produce Bakken/Three Forks Formation oil and associated natural gas therefrom, provided that operations for the drilling of said well must commence within one (1) year of the date of the requested Order;
4. Within ninety (90) days of first production from the requested authorized Bakken/Three Forks Formation well Applicant shall submit an Application to the Board requesting the establishment of a permanent spacing unit therefore and the production of Bakken/Three Forks Formation oil and associated natural gas therefrom; and
5. For such other or additional relief as the Board may deem appropriate.

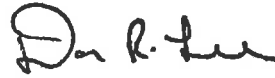
Dated November 6, 2025.

RECEIVED

NOV 10 2025

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

LEE LAW OFFICE PC



By: _____

Don R. Lee, Attorney for Applicant
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NOV 10 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 PHOENIX OPERATING LLC FOR AN
ORDER AUTHORIZING THE DRILLING
OF UP TO THREE (3) ADDITIONAL
HORIZONTAL BAKKEN/THREE FORKS
FORMATION WELLS WITHIN AND UPON
THE TEMPORARY SPACING UNIT
COMPRISED OF ALL OF SECTIONS 3 and
10, TOWNSHIP 25 NORTH, RANGE 56
EAST, AND SECTIONS 27 AND 34,
TOWNSHIP 26 NORTH, RANGE 56 EAST,
RICHLAND COUNTY, AT ANY
LOCATIONS NOT CLOSER THAN 200'
(HEEL/TOE SETBACKS) AND 500'
(LATERAL SETBACKS) TO THE
BOUNDARIES THEREOF, AND SUCH
OTHER AND FURTHER RELIEF AS THE
BOARD MAY DEEM APPROPRIATE.**

APPLICATION

MBOGC DOCKET NO. 436-2025

RECEIVED

NOV 10 2025

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

Phoenix Operating LLC ("Applicant"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, presents the following Application:

1. Applicant is the owner of oil and gas leasehold interests in, to and under the following described lands in Richland County:

Township 25 North, Range 56 East, MPM

Section 03: All

Section 10: All

Containing 1,280 acres, more or less

Township 26 North, Range 56 East, MPM

Section 27: All

Section 34: All

Containing 1,280 acres, more or less

2. Applicant requests an Order from this Board authorizing the drilling of and production of up to three (3) additional horizontal Bakken/Three Forks Formation wells within and upon the temporary spacing unit comprised of Sections 3 and 10, Township 25 North, Range 56 East, and Sections 27 and 34, Township 26 North, Range 56 East, and at any location not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks) to the exterior boundaries of said temporary spacing unit.

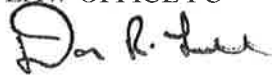
3. Applicant believes that approval and granting of the request herein will be in the best interest of prevention of waste of oil and associated natural gas and the conservation thereof and will not adversely affect the correlative rights of any interested party.
4. In the event an authorized well is completed as a well capable of commercial production of Bakken/Three Forks Formation oil and associated natural gas, Applicant will submit within ninety (90) days of first production from any such well an Application with this Board requesting the establishment of a permanent spacing unit therefore.

WHEREFORE, Applicant requests the following:

1. This matter be set for hearing by this Board and notice thereof be given as required by law;
2. After hearing this matter this Board enter its Order authorizing the Applicant to drill up to three (3) additional Bakken/Three Forks Formation wells within and upon the temporary spacing unit consisting of Sections 3 and 10, Township 25 North, Range 56 East, and Sections 27 and 34, Township 26 North, Range 56 East, but not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks) to the exterior boundaries of said temporary spacing unit;
3. Within ninety (90) days of first production from any authorized Bakken/Three Forks Formation well Applicant shall submit an Application to this Board requesting the establishment of a permanent spacing unit therefore; and
4. For such other or additional relief as this Board may deem appropriate.

Dated November 6, 2025.

LEE LAW OFFICE PC



By: _____

Don R. Lee, Attorney for Applicant
Lee Law Office PC
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RECEIVED

NOV 10 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 PHOENIX OPERATING LLC FOR AN
ORDER VACATING AND RESCINDING
BOARD ORDER NO. 48-2025 AND
ADDITIONALLY DESIGNATING AND
DELINEATING A TEMPORARY SPACING
UNIT CONSISTING OF SECTIONS 2 AND
11, TOWNSHIP 25 NORTH, RANGE 56
EAST, AND SECTIONS 26 AND 35,
TOWNSHIP 26 NORTH, RANGE 56 EAST,
RICHLAND COUNTY, AND AUTHORIZING
THE DRILLING OF AND PRODUCTION
FROM A HORIZONTAL BAKKEN/THREE
FORKS FORMATION WELL WITHIN AND
UPON THE REQUESTED TEMPORARY
SPACING UNIT AT ANY LOCATION NOT
CLOSER THAN 200' TO THE HEEL/TOE
SETBACKS AND 500' TO THE LATERAL
SETBACKS OF THE REQUESTED
TEMPORARY SPACING UNIT.**

APPLICATION

MBOGC DOCKET NO. 437 - 2025

RECEIVED

NOV 10 2025

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

Phoenix Operating LLC ("Applicant"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, presents the following Application:

1. Applicant is the owner of oil and gas leasehold interests in, to and under the following described lands in Richland County:

Township 25 North, Range 56 East, MPM

Section 02: All

Section 11: All

Township 26 North, Range 56 East, MPM

Section 26: All

Section 35: All

Containing 2,560 acres, more or less

2. Pursuant to Board Order No. 48-2025, dated February 20, 2025, this Board designated all of Sections 2 and 11, Township 25 North, Range 56 East, and Sections 26 and 35, Township 26 North, Range 56 East, as a temporary spacing unit for the drilling of a Bakken Formation horizontal well. The proposed well the subject of the foregoing Order was never drilled nor has said Order been vacated by this Board and for good cause Applicant requests this Order be vacated and rescinded.
3. Applicant desires to drill a horizontal Bakken/Three Forks Formation well within and upon Sections 2 and 11, Township 25 North, Range 56 East, and Sections 26 and 35, Township 26

North, Range 56 East, and in order to more efficiently and economically recover Bakken/Three Forks oil and associated natural gas therefrom believes the temporary spacing unit therefore should consist of all of Sections 2 and 11, Township 25 North, Range 56 East, and Sections 26 and 35, Township 26 North, Range 56 East, containing 2,560 acres.

4. Applicant believes the requested 200' heel/toe setbacks and 500' lateral setbacks from the requested spacing unit boundaries are necessary in order to adequately and efficiently increase the ultimate recovery of Bakken/Three Forks Formation oil and associated natural gas from the requested temporary spacing unit.
5. In the event Applicant's proposed horizontal Bakken/Three Forks Formation well referred to above is authorized by this Board and thereafter drilled and completed as a well capable of commercial production of Bakken/Three Forks Formation oil and associated natural gas, within ninety (90) days of such completion Applicant will file an appropriate Application with this Board requesting a permanent spacing unit for said well and Bakken/Three Forks Formation oil and associated natural gas produced therefrom.
6. Applicant believes that granting of the requests herein will serve to protect the correlative rights of all interested parties and will be in the best interest of prevention of waste and conservation of Bakken/Three Forks Formation oil and natural gas produced in association therewith.

WHEREFORE, Applicant requests the following:

1. This matter be set for hearing by the Board and notice thereof be given as required by law;
2. After hearing this matter the Board enter its Order vacating and rescinding Board Order No. 48-2025 and terminating the temporary spacing units created thereby and authorizing of the drilling of up to three (3) additional Bakken/Three Formation wells;
3. After hearing this matter the Board enter its Order designating Sections 2 and 11, Township 25 North, Range 56 East, and Sections 26 and 35, Township 26 North, Range 56 East, as a temporary spacing unit and authorizing Applicant to drill, complete and produce Bakken/Three Forks Formation oil and associated natural gas therefrom, provided that operations for the drilling of said well must commence within one (1) year of the date of the requested Order;
4. Within ninety (90) days of first production from the requested authorized Bakken/Three Forks Formation well Applicant shall submit an Application to the Board requesting the establishment of a permanent spacing unit therefore and the production of Bakken/Three Forks Formation oil and associated natural gas therefrom; and
5. For such other or additional relief as the Board may deem appropriate.

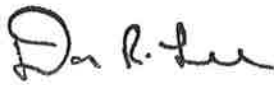
Dated November 6, 2025.

RECEIVED

NOV 10 2025

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

LEE LAW OFFICE PC

By: 
Don R. Lee, Attorney for Applicant
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NOV 10 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 PHOENIX OPERATING LLC FOR AN
ORDER AUTHORIZING THE DRILLING
OF UP TO THREE (3) ADDITIONAL
HORIZONTAL BAKKEN/THREE FORKS
FORMATION WELLS WITHIN AND UPON
THE TEMPORARY SPACING UNIT
COMPRISED OF ALL OF SECTIONS 2 and
11, TOWNSHIP 25 NORTH, RANGE 56
EAST AND SECTIONS 26 AND 35,
TOWNSHIP 26 NORTH, RANGE 56 EAST,
RICHLAND COUNTY, AT ANY
LOCATIONS NOT CLOSER THAN 200'
(HEEL/TOE SETBACKS) AND 500'
(LATERAL SETBACKS) TO THE
BOUNDARIES THEREOF, AND SUCH
OTHER AND FURTHER RELIEF AS THE
BOARD MAY DEEM APPROPRIATE.**

APPLICATION

MBOGC DOCKET NO. 438-2025

Phoenix Operating LLC ("Applicant"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, presents the following Application:

1. Applicant is the owner of oil and gas leasehold interests in, to and under the following described lands in Richland County:

Township 25 North, Range 56 East, MPM

Section 02: All

Section 11: All

Township 26 North, Range 56 East, MPM

Section 26: All

Section 35: All

Containing 2,560 acres, more or less

2. Applicant requests an Order from this Board authorizing the drilling of and production of up to three (3) additional horizontal Bakken/Three Forks Formation wells within and upon the temporary spacing unit comprised of Sections 2 and 11, Township 25 North, Range 56 East, and Sections 26 and 35, Township 26 North, Range 56 East, and at any location not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks) to the exterior boundaries of said temporary spacing unit.

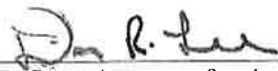
3. Applicant believes that approval and granting of the request herein will be in the best interest of prevention of waste of oil and associated natural gas and the conservation thereof and will not adversely affect the correlative rights of any interested party.
4. In the event an authorized well is completed as a well capable of commercial production of Bakken/Three Forks Formation oil and associated natural gas, Applicant will submit within ninety (90) days of first production from any such well an Application with this Board requesting the establishment of a permanent spacing unit therefore.

WHEREFORE, Applicant requests the following:

1. This matter be set for hearing by this Board and notice thereof be given as required by law;
2. After hearing this matter this Board enter its Order authorizing the Applicant to drill up to three (3) additional Bakken/Three Forks Formation wells within and upon the temporary spacing unit consisting of Sections 2 and 11, Township 25 North, Range 56 East, and Sections 26 and 35, Township 26 North, Range 56 East, but not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks) to the exterior boundaries of said temporary spacing unit;
3. Within ninety (90) days of first production from any authorized Bakken/Three Forks Formation well Applicant shall submit an Application to this Board requesting the establishment of a permanent spacing unit therefore; and
4. For such other or additional relief as this Board may deem appropriate.

Dated November 6, 2025.

LEE LAW OFFICE PC

By: 
Don R. Lee, Attorney for Applicant
Lee Law Office PC
158 Main Street – P.O. Box 790
Shelby, MT 59474
Telephone: (406) 434-5244
Facsimile: (406) 434-5246
Email: don@leelawofficepc.com

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

**IN THE MATTER OF THE APPLICATION
OF PHOENIX OPERATING LLC FOR AN
ORDER VACATING AND RESCINDING
BOARD ORDER NO. 47-2025 AND
ADDITIONALLY DESIGNATING AND
DELINEATING A TEMPORARY SPACING
UNIT CONSISTING OF SECTIONS 1 AND
12, TOWNSHIP 25 NORTH, RANGE 56
EAST, AND ALL OF SECTIONS 25 AND 36,
TOWNSHIP 26 NORTH, RANGE 56 EAST,
RICHLAND COUNTY, AND AUTHORIZING
THE DRILLING OF AND PRODUCTION
FROM A HORIZONTAL BAKKEN/THREE
FORKS FORMATION WELL WITHIN AND
UPON THE REQUESTED TEMPORARY
SPACING UNIT AT ANY LOCATION NOT
CLOSER THAN 200' TO THE HEEL/TOE
SETBACKS AND 500' TO THE LATERAL
SETBACKS OF THE REQUESTED
TEMPORARY SPACING UNIT.**

APPLICATION

MBOGC DOCKET NO. 439 - 2025

RECEIVED

NOV 10 2025

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

Phoenix Operating LLC ("Applicant"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, presents the following Application:

1. Applicant is the owner of oil and gas leasehold interests in, to and under the following described lands in Richland County:

Township 25 North, Range 56 East, MPM

Section 01: All

Section 12: All

Township 26 North, Range 56 East, MPM

Section 25: All

Section 36: All

Containing 1,280 acres, more or less

2. Pursuant to Board Order No. 47-2025, dated February 20, 2025, this Board designated all of Sections 1 and 12, Township 25 North, Range 56 East, and Sections 25 and 36, Township 26 North, Range 56 East, as a temporary spacing unit for the drilling of a Bakken Formation horizontal well. The proposed well the subject of the foregoing Order was never drilled nor has said Order been vacated by this Board and for good cause Applicant requests this Order be vacated and rescinded.
3. Applicant desires to drill a horizontal Bakken/Three Forks Formation well within and upon Sections 1 and 12, Township 25 North, Range 56 East, and Sections 25 and 36, Township 26 North, Range 56 East and in order to more efficiently and economically recover Bakken/Three

Forks oil and associated natural gas therefrom believes the temporary spacing unit therefore should consist of all of Sections 1 and 12, Township 25 North, Range 56 East, and Sections 25 and 36, Township 26 North, Range 56 East, containing 1,280 acres.

4. Applicant believes the requested 200' heel/toe setbacks and 500' lateral setbacks from the requested spacing unit boundaries are necessary in order to adequately and efficiently increase the ultimate recovery of Bakken/Three Forks Formation oil and associated natural gas from the requested temporary spacing unit.
5. In the event Applicant's proposed horizontal Bakken/Three Forks Formation well referred to above is authorized by this Board and thereafter drilled and completed as a well capable of commercial production of Bakken/Three Forks Formation oil and associated natural gas, within ninety (90) days of such completion Applicant will file an appropriate Application with this Board requesting a permanent spacing unit for said well and Bakken/Three Forks Formation oil and associated natural gas produced therefrom.
6. Applicant believes that granting of the requests herein will serve to protect the correlative rights of all interested parties and will be in the best interest of prevention of waste and conservation of Bakken/Three Forks Formation oil and natural gas produced in association therewith.

WHEREFORE, Applicant requests the following:

1. This matter be set for hearing by the Board and notice thereof be given as required by law;
2. After hearing this matter the Board enter its Order vacating and rescinding Board Order No. 47-2025 and terminating the temporary spacing units created thereby and authorizing of the drilling of up to three (3) additional Bakken/Three Formation wells;
3. After hearing this matter the Board enter its Order designating Sections 1 and 12, Township 25 North, Range 56 East, and Sections 25 and 36, Township 26 North, Range 56 East, as a temporary spacing unit and authorizing Applicant to drill, complete and produce Bakken/Three Forks Formation oil and associated natural gas therefrom, provided that operations for the drilling of said well must commence within one (1) year of the date of the requested Order;
4. Within ninety (90) days of first production from the requested authorized Bakken/Three Forks Formation well Applicant shall submit an Application to the Board requesting the establishment of a permanent spacing unit therefore and the production of Bakken/Three Forks Formation oil and associated natural gas therefrom; and
5. For such other or additional relief as the Board may deem appropriate.

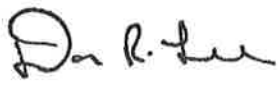
Dated November 6, 2025.

RECEIVED

NOV 10 2025

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

LEE LAW OFFICE PC

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NOV 10 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 PHOENIX OPERATING LLC FOR AN
ORDER AUTHORIZING THE DRILLING
OF UP TO THREE (3) ADDITIONAL
HORIZONTAL BAKKEN/THREE FORKS
FORMATION WELLS WITHIN AND UPON
THE TEMPORARY SPACING UNIT
COMPRISED OF ALL OF SECTIONS 1 &
12, TOWNSHIP 25 NORTH, RANGE 56
EAST, AND ALL OF SECTIONS 25 & 36,
TOWNSHIP 26 NORTH, RANGE 56 EAST,
RICHLAND COUNTY, AT ANY
LOCATIONS NOT CLOSER THAN 200'
(HEEL/TOE SETBACKS) AND 500'
(LATERAL SETBACKS) TO THE
BOUNDARIES THEREOF, AND SUCH
OTHER AND FURTHER RELIEF AS THE
BOARD MAY DEEM APPROPRIATE.**

APPLICATION

MBOGC DOCKET NO. 440-2025

Phoenix Operating LLC ("Applicant"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, presents the following Application:

1. Applicant is the owner of oil and gas leasehold interests in, to and under the following described lands in Richland County:

Township 25 North, Range 56 East, MPM

Section 01: All

Section 12: All

Township 26 North, Range 56 East, MPM

Section 25: All

Section 36: All

Containing 1,280 acres, more or less

2. Applicant requests an Order from this Board authorizing the drilling of and production of up to three (3) additional horizontal Bakken/Three Forks Formation wells within and upon the temporary spacing unit comprised of Sections 1 and 12, Township 25 North, Range 56 East, and Sections 25 and 36, Township 26 North, Range 56 East, and at any location not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks) to the exterior boundaries of said temporary spacing unit.

3. Applicant believes that approval and granting of the request herein will be in the best interest of prevention of waste of oil and associated natural gas and the conservation thereof and will not adversely affect the correlative rights of any interested party.
4. In the event an authorized well is completed as a well capable of commercial production of Bakken/Three Forks Formation oil and associated natural gas, Applicant will submit within ninety (90) days of first production from any such well an Application with this Board requesting the establishment of a permanent spacing unit therefore.

WHEREFORE, Applicant requests the following:

1. This matter be set for hearing by this Board and notice thereof be given as required by law;
2. After hearing this matter this Board enter its Order authorizing the Applicant to drill up to three (3) additional Bakken/Three Forks Formation wells within and upon the temporary spacing unit consisting of Sections 1 and 12, Township 25 North, Range 56 East, and Sections 25 and 36, Township 26 North, Range 56 East, but not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks) to the exterior boundaries of said temporary spacing unit;
3. Within ninety (90) days of first production from any authorized Bakken/Three Forks Formation well Applicant shall submit an Application to this Board requesting the establishment of a permanent spacing unit therefore; and
4. For such other or additional relief as this Board may deem appropriate.

Dated November 6, 2025.

LEE LAW OFFICE PC

By: 

Don R. Lee, Attorney for Applicant
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Facsimile: (406) 434-5246
Email: don@leelawofficepc.com

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

**IN THE MATTER OF THE APPLICATION
OF PHOENIX OPERATING LLC FOR AN
ORDER VACATING AND RESCINDING
BOARD ORDER NO. 44-2012 AND
ADDITIONALLY DESIGNATING AND
DELINEATING A TEMPORARY SPACING
UNIT CONSISTING OF SECTIONS 5 & 8,
TOWNSHIP 25 NORTH, RANGE 57 EAST,
RICHLAND COUNTY, AND AUTHORIZING
THE DRILLING OF AND PRODUCTION
FROM A HORIZONTAL BAKKEN/THREE
FORKS FORMATION WELL WITHIN AND
UPON THE REQUESTED TEMPORARY
SPACING UNIT AT ANY LOCATION NOT
CLOSER THAN 200' TO THE HEEL/TOE
SETBACKS AND 500' TO THE LATERAL
SETBACKS OF THE REQUESTED
TEMPORARY SPACING UNIT.**

APPLICATION

MBOGC DOCKET NO. 441 - 2025

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

Phoenix Operating LLC ("Applicant"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, presents the following Application:

1. Applicant is the owner of oil and gas leasehold interests in, to and under the following described lands in Roosevelt County:

Township 25 North, Range 57 East, MPM

Section 5: Lots 1, 2, 3 & 4, S $\frac{1}{2}$ N $\frac{1}{2}$, S $\frac{1}{2}$ (All)

Section 8: All

Containing 1,269.56 acres, more or less

2. Pursuant to Board Order No. 44-2012, dated March 8, 2012, this Board designated all of Sections 5 and 8, Township 25 North, Range 57 East, as a temporary spacing unit for the drilling of a Bakken/Three Forks Formation horizontal well. The proposed well the subject of the foregoing Order was never drilled nor has said Order been vacated by this Board and for good cause Applicant requests this Order be vacated and rescinded.
3. Applicant desires to drill a horizontal Bakken/Three Forks Formation well within and upon Sections 5 and 8, Township 25 North, Range 57 East, and in order to more efficiently and economically recover Bakken/Three Forks oil and associated natural gas therefrom believes the temporary spacing unit therefore should consist of all of Sections 5 and 8, Township 25 North, Range 57 East, containing 1,269.56 acres.
4. Applicant believes the requested 200' heel/toe setbacks and 500' lateral setbacks from the requested spacing unit boundaries are necessary in order to adequately and efficiently increase the

ultimate recovery of Bakken/Three Forks Formation oil and associated natural gas from the requested temporary spacing unit.

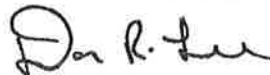
5. In the event Applicant's proposed horizontal Bakken/Three Forks Formation well referred to above is authorized by this Board and thereafter drilled and completed as a well capable of commercial production of Bakken/Three Forks Formation oil and associated natural gas, within ninety (90) days of such completion Applicant will file an appropriate Application with this Board requesting a permanent spacing unit for said well and Bakken/Three Forks Formation oil and associated natural gas produced therefrom.
6. Applicant believes that granting of the requests herein will serve to protect the correlative rights of all interested parties and will be in the best interest of prevention of waste and conservation of Bakken/Three Forks Formation oil and natural gas produced in association therewith.

WHEREFORE, Applicant requests the following:

1. This matter be set for hearing by the Board and notice thereof be given as required by law;
2. After hearing this matter the Board enter its Order vacating and rescinding Board Order No. 44-2012 and terminating the temporary spacing units created thereby and authorizing of the drilling of up to three (3) additional Bakken/Three Forks Formation wells;
3. After hearing this matter the Board enter its Order designating Sections 5 and 8, Township 25 North, Range 57 East, as a temporary spacing unit and authorizing Applicant to drill, complete and produce Bakken/Three Forks Formation oil and associated natural gas therefrom, provided that operations for the drilling of said well must commence within one (1) year of the date of the requested Order;
4. Within ninety (90) days of first production from the requested authorized Bakken/Three Forks Formation well Applicant shall submit an Application to the Board requesting the establishment of a permanent spacing unit therefore and the production of Bakken/Three Forks Formation oil and associated natural gas therefrom; and
5. For such other or additional relief as the Board may deem appropriate.

Dated November 6, 2025.

LEE LAW OFFICE PC



By: _____

Don R. Lee, Attorney for Applicant
Lee Law Office PC
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Shelby, MT 59474
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Email: don@leelawofficepc.com

RECEIVED

NOV 10 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 PHOENIX OPERATING LLC FOR AN
ORDER AUTHORIZING THE DRILLING
OF UP TO THREE (3) ADDITIONAL
HORIZONTAL BAKKEN/THREE FORKS
FORMATION WELLS WITHIN AND UPON
THE TEMPORARY SPACING UNIT
COMPRISED OF ALL OF SECTIONS 5 & 8,
TOWNSHIP 25 NORTH, RANGE 57 EAST,
RICHLAND COUNTY, AT ANY
LOCATIONS NOT CLOSER THAN 200'
(HEEL/TOE SETBACKS) AND 500'
(LATERAL SETBACKS) TO THE
BOUNDARIES THEREOF, AND SUCH
OTHER AND FURTHER RELIEF AS THE
BOARD MAY DEEM APPROPRIATE.**

APPLICATION

MBOGC DOCKET NO. 442-2025

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NOV 10 2025

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

Phoenix Operating LLC ("Applicant"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, presents the following Application:

1. Applicant is the owner of oil and gas leasehold interests in, to and under the following described lands in Richland County:

Township 25 North, Range 57 East, MPM

Section 5: Lots 1, 2, 3 & 4, S½N½, S½ (All)

Section 8: All

Containing 1269.56 acres, more or less

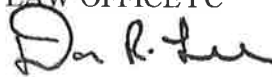
2. Applicant requests an Order from this Board authorizing the drilling of and production of up to three (3) additional horizontal Bakken/Three Forks Formation wells within and upon the temporary spacing unit comprised of Sections 5 and 8, Township 25 North, Range 57 East, at any location not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks) to the exterior boundaries of said temporary spacing unit.
3. Applicant believes that approval and granting of the request herein will be in the best interest of prevention of waste of oil and associated natural gas and the conservation thereof and will not adversely affect the correlative rights of any interested party.
4. In the event an authorized well is completed as a well capable of commercial production of Bakken/Three Forks Formation oil and associated natural gas, Applicant will submit within ninety (90) days of first production from any such well an Application with this Board requesting the establishment of a permanent spacing unit therefore.

WHEREFORE, Applicant requests the following:

1. This matter be set for hearing by this Board and notice thereof be given as required by law;
2. After hearing this matter this Board enter its Order authorizing the Applicant to drill up to three (3) additional Bakken/Three Forks Formation wells within and upon the temporary spacing unit consisting of Sections 5 and 8, Township 25 North, Range 57 East, but not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks) to the exterior boundaries of said temporary spacing unit;
3. Within ninety (90) days of first production from any authorized Bakken/Three Forks Formation well Applicant shall submit an Application to this Board requesting the establishment of a permanent spacing unit therefore; and
4. For such other or additional relief as this Board may deem appropriate.

Dated November 6, 2025.

LEE LAW OFFICE PC



By: _____

Don R. Lee, Attorney for Applicant
Lee Law Office PC
158 Main Street – P.O. Box 790
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RECEIVED

NOV 10 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 PHOENIX OPERATING LLC FOR AN
ORDER VACATING AND RESCINDING
BOARD ORDER NOS. 636-2012, 164-2013,
188-2025, 189-2025, 190-2025 & 191-2025 AND
ADDITIONALLY DESIGNATING AND
DELINEATING AN OVERLAPPING
TEMPORARY SPACING UNIT
CONSISTING OF SECTIONS 17, 20, 29 & 32,
TOWNSHIP 25 NORTH, RANGE 57 EAST,
RICHLAND COUNTY, AND AUTHORIZING
THE DRILLING OF AND PRODUCTION
FROM A HORIZONTAL BAKKEN/THREE
FORKS FORMATION WELL WITHIN AND
UPON THE REQUESTED OVERLAPPING
TEMPORARY SPACING UNIT AT ANY
LOCATION NOT CLOSER THAN 200' TO
THE HEEL/TOE SETBACKS AND 500' TO
THE LATERAL SETBACKS OF THE
REQUESTED OVERLAPPING
TEMPORARY SPACING UNIT.**

APPLICATION

MBOGC DOCKET NO. 443 - 2025

Phoenix Operating LLC ("Applicant"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, presents the following Application:

1. Applicant is the owner of oil and gas leasehold interests in, to and under the following described lands in Richland County:

Township 25 North, Range 57 East. MPM

Section 17: All

Section 20: All

Section 29: All

Section 32: All

Containing 2,560.00 acres, more or less

2. Pursuant to Board Order No. 636-2012, dated December 13, 2012, this Board designated an exception to Board Order 380-2011 to authorize the drilling of a horizontal Bakken/Three Forks Formation well anywhere within the temporary spacing unit comprised of all of Sections 29 and 32, Township 25 North, Range 57 East. The proposed well the subject of the foregoing Order was never drilled nor has said Order been vacated by this Board and for good cause Applicant requests this Order be vacated and rescinded.
3. Pursuant to Board Order No. 164-2013, dated April 25, 2013, this Board authorized the drilling of up to three (3) additional horizontal Bakken/Three Forks Formation well in the permanent spacing unit comprised of all of Sections 17 and 20, Township 25 North, Range 57 East. The

proposed well the subject of the foregoing Order was never drilled nor has said Order been vacated by this Board and for good cause Applicant requests the foregoing Order be vacated and rescinded.

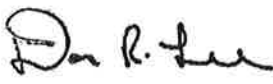
4. Pursuant to Board Order No. 188-2025, dated August 14, 2025, this Board designated this Board designated all of Sections 27, 28, 29 and 30, Township 25 North, Range 57 East, as a temporary spacing unit for the drilling of a Bakken/Three Forks Formation horizontal well. The proposed well the subject of the foregoing Order was never drilled nor has said Order been vacated by this Board and for good cause Applicant requests the foregoing Order be vacated and rescinded.
5. Pursuant to Board Order No. 189-2025, dated August 14, 2025, this Board authorized the drilling of up to three (3) additional horizontal Bakken/Three Forks Formation well in the overlapping temporary spacing unit comprised of all of Sections 27, 28, 29 and 30, Township 25 North, Range 57 East. The proposed well the subject of the foregoing Order was never drilled nor has said Order been vacated by this Board and for good cause Applicant requests the foregoing Order be vacated and rescinded.
6. Pursuant to Board Order No. 190-2025, dated August 14, 2025, this Board designated this Board designated all of Sections 31, 32, 33 and 34, Township 25 North, Range 57 East, as a temporary spacing unit for the drilling of a Bakken/Three Forks Formation horizontal well. The proposed well the subject of the foregoing Order was never drilled nor has said Order been vacated by this Board and for good cause Applicant requests the foregoing Order be vacated and rescinded.
7. Pursuant to Board Order No. 191-2025, dated August 14, 2025, this Board authorized the drilling of up to three (3) additional horizontal Bakken/Three Forks Formation well in the overlapping temporary spacing unit comprised of all of Sections 31, 32, 33 and 34, Township 25 North, Range 57 East. The proposed well the subject of the foregoing Order was never drilled nor has said Order been vacated by this Board and for good cause Applicant requests the foregoing Order be vacated and rescinded.
8. Applicant desires to drill a horizontal Bakken/Three Forks Formation well within and upon Sections 17, 20, 29 and 32, Township 25 North, Range 57 East, and in order to more efficiently and economically recover Bakken/Three Forks oil and associated natural gas therefrom believes an overlapping temporary spacing unit therefore should consist of all of Sections 17, 20, 29 and 32, Township 25 North, Range 57 East, containing 2,560.00 acres.
9. Applicant believes the requested 200' heel/toe setbacks and 500' lateral setbacks from the requested spacing unit boundaries are necessary in order to adequately and efficiently increase the ultimate recovery of Bakken/Three Forks Formation oil and associated natural gas from the requested overlapping temporary spacing unit.
10. In the event Applicant's proposed horizontal Bakken/Three Forks Formation well referred to above is authorized by this Board and thereafter drilled and completed as a well capable of commercial production of Bakken/Three Forks Formation oil and associated natural gas, within ninety (90) days of such completion Applicant will file an appropriate Application with this Board requesting a permanent spacing unit for said well and Bakken/Three Forks Formation oil and associated natural gas produced therefrom.
11. Applicant believes that granting of the requests herein will serve to protect the correlative rights of all interested parties and will be in the best interest of prevention of waste and conservation of Bakken/Three Forks Formation oil and natural gas produced in association therewith.

WHEREFORE, Applicant requests the following:

1. This matter be set for hearing by the Board and notice thereof be given as required by law;
2. After hearing this matter the Board enter its Order vacating and rescinding Board Order Nos. 636-2012, 164-2013, 188-2025, 189-2025, 190-2025 and 191-2025 and terminating the temporary spacing units created thereby and authorizing of the drilling of up to three (3) additional Bakken/Three Formation wells;
3. After hearing this matter the Board enter its Order designating Sections 17, 20, 29 and 32, Township 25 North, Range 57 East, as the overlapping temporary spacing unit and authorizing Applicant to drill, complete and produce Bakken/Three Forks Formation oil and associated natural gas therefrom, provided that operations for the drilling of said well must commence within one (1) year of the date of the requested Order;
4. Within ninety (90) days of first production from the requested authorized Bakken/Three Forks Formation well Applicant shall submit an Application to the Board requesting the establishment of a permanent spacing unit therefore and the production of Bakken/Three Forks Formation oil and associated natural gas therefrom; and
5. For such other or additional relief as the Board may deem appropriate.

Dated November 6, 2025.

LEE LAW OFFICE PC

By: 
Don R. Lee, Attorney for Applicant
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Facsimile: (406) 434-5246
Email: don@leelawofficepc.com

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

**IN THE MATTER OF THE APPLICATION
OF PHOENIX OPERATING LLC FOR AN
ORDER AUTHORIZING THE DRILLING
OF UP TO THREE (3) ADDITIONAL
HORIZONTAL BAKKEN/THREE FORKS
FORMATION WELLS WITHIN AND UPON
THE OVERLAPPING TEMPORARY
SPACING UNIT COMPRISED OF ALL OF
SECTIONS 17, 20, 29 & 32, TOWNSHIP 25
NORTH, RANGE 57 EAST, RICHLAND
COUNTY, AT ANY LOCATIONS NOT
CLOSER THAN 200' (HEEL/TOE
SETBACKS) AND 500' (LATERAL
SETBACKS) TO THE BOUNDARIES
THEREOF, AND SUCH OTHER AND
FURTHER RELIEF AS THE BOARD MAY
DEEM APPROPRIATE.**

APPLICATION

MBOGC DOCKET NO. 444-2025

Phoenix Operating LLC ("Applicant"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, presents the following Application:

1. Applicant is the owner of oil and gas leasehold interests in, to and under the following described lands in Richland County:

Township 25 North, Range 57 East, MPM

Section 17: All

Section 20: All

Section 29: All

Section 32: All

Containing 2,560.00 acres, more or less

2. Applicant requests an Order from this Board authorizing the drilling of and production of up to three (3) additional horizontal Bakken/Three Forks Formation wells within and upon an overlapping temporary spacing unit comprised of Sections 17, 20, 29 and 32, Township 25 North, Range 57 East, at any location not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks) to the exterior boundaries of said temporary spacing unit.
3. Applicant believes that approval and granting of the request herein will be in the best interest of prevention of waste of oil and associated natural gas and the conservation thereof and will not adversely affect the correlative rights of any interested party.

4. In the event an authorized well is completed as a well capable of commercial production of Bakken/Three Forks Formation oil and associated natural gas, Applicant will submit within ninety (90) days of first production from any such well an Application with this Board requesting the establishment of a permanent spacing unit therefore.

WHEREFORE, Applicant requests the following:

1. This matter be set for hearing by this Board and notice thereof be given as required by law;
2. After hearing this matter this Board enter its Order authorizing the Applicant to drill up to three (3) additional Bakken/Three Forks Formation wells within and upon the overlapping temporary spacing unit consisting of Sections 17, 20, 29 and 32, Township 25 North, Range 57 East, but not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks) to the exterior boundaries of said temporary spacing unit;
3. Within ninety (90) days of first production from any authorized Bakken/Three Forks Formation well Applicant shall submit an Application to this Board requesting the establishment of a permanent spacing unit therefore; and
4. For such other or additional relief as this Board may deem appropriate.

Dated November 6, 2025.

LEE LAW OFFICE PC

By: 

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

**IN THE MATTER OF THE
APPLICATION OF PHOENIX
OPERATING LLC FOR AN ORDER
VACATING AND RESCINDING BOARD
ORDER NOS. 151-2003, 093-2010, 163-
2012, 377-2012, 267-2014, 155-2024, 157-
2024, AND 158-2024, AND
ADDITIONALLY DESIGNATING AND
DELINEATING A TEMPORARY
SPACING UNIT CONSISTING OF
SECTIONS 3, 10, 15, 22 AND 27,
TOWNSHIP 24 NORTH, RANGE 58
EAST, RICHLAND COUNTY, AND
AUTHORIZING THE DRILLING OF
AND PRODUCTION FROM A
HORIZONTAL BAKKEN/THREE
FORKS FORMATION WELL WITHIN
AND UPON THE REQUESTED
TEMPORARY SPACING UNIT AT ANY
LOCATION NOT CLOSER THAN 200'
TO THE HEEL/TOE SETBACKS AND
500' TO THE LATERAL SETBACKS OF
THE REQUESTED TEMPORARY
SPACING UNIT.**

APPLICATION

MBOGC DOCKET NO. 445 - 2025

Phoenix Operating LLC ("Applicant"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, presents the following Application:

1. Applicant is the owner of oil and gas leasehold interests in, to and under the following described lands in Richland County:

Township 24 North, Range 58 East, MPM

Section 03: All

Section 10: All

Section 15: All

Section 22: All

Section 27: All

Containing 3,200 acres, more or less

2. Pursuant to Board Order Nos. 151-2003, 093-2010, 163-2012, 377-2012, 267-2014, 155-2024, 157-2024, and 158-2024, this Board designated all of Sections 3, 10, 15, 22 and 27, Township 24 North, Range 58 East, as a temporary spacing unit for the drilling of a

Bakken Formation horizontal well. The proposed well the subject of the foregoing Order was never drilled nor has said Order been vacated by this Board and for good cause Applicant requests this Order be vacated and rescinded.

3. Applicant desires to drill a horizontal Bakken/Three Forks Formation well within and upon Sections 3, 10, 15, 22 and 27, Township 24 North, Range 58 East, and in order to more efficiently and economically recover Bakken/Three Forks oil and associated natural gas therefrom believes the temporary spacing unit therefore should consist of all of Sections 3, 10, 15, 22 and 27, Township 24 North, Range 58 East, containing 3,200 acres.
4. Applicant believes the requested 200' heel/toe setbacks and 500' lateral setbacks from the requested spacing unit boundaries are necessary in order to adequately and efficiently increase the ultimate recovery of Bakken/Three Forks Formation oil and associated natural gas from the requested temporary spacing unit.
5. In the event Applicant's proposed horizontal Bakken/Three Forks Formation well referred to above is authorized by this Board and thereafter drilled and completed as a well capable of commercial production of Bakken/Three Forks Formation oil and associated natural gas, within ninety (90) days of such completion Applicant will file an appropriate Application with this Board requesting a permanent spacing unit for said well and Bakken/Three Forks Formation oil and associated natural gas produced therefrom.
6. Applicant believes that granting of the requests herein will serve to protect the correlative rights of all interested parties and will be in the best interest of prevention of waste and conservation of Bakken/Three Forks Formation oil and natural gas produced in association therewith.

WHEREFORE, Applicant requests the following:

1. This matter be set for hearing by the Board and notice thereof be given as required by law;
2. After hearing this matter the Board enter its Order vacating and rescinding Board Order Nos. 151-2003, 093-2010, 163-2012, 377-2012, 267-2014, 155-2024, 157-2024, and 158-2024 and terminating the temporary spacing units created thereby and authorizing of the drilling of up to three (3) additional Bakken/Three Formation wells;
3. After hearing this matter the Board enter its Order designating Sections 3, 10, 15, 22 and 27, Township 24 North, Range 58 East, as a temporary spacing unit and authorizing Applicant to drill, complete and produce Bakken/Three Forks Formation oil and associated natural gas therefrom, provided that operations for the drilling of said well must commence within one (1) year of the date of the requested Order;

4. Within ninety (90) days of first production from the requested authorized Bakken/Three Forks Formation well Applicant shall submit an Application to the Board requesting the establishment of a permanent spacing unit therefore and the production of Bakken/Three Forks Formation oil and associated natural gas therefrom; and
5. For such other or additional relief as the Board may deem appropriate.

Dated November 6, 2025.

LEE LAW OFFICE PC

By: 

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Facsimile: (406) 434-5246
Email: don@leelawofficepc.com

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

**IN THE MATTER OF THE APPLICATION
OF PHOENIX OPERATING LLC FOR AN
ORDER AUTHORIZING THE DRILLING
OF UP TO THREE (3) ADDITIONAL
HORIZONTAL BAKKEN/THREE FORKS
FORMATION WELLS WITHIN AND UPON
THE TEMPORARY SPACING UNIT
COMPRISED OF ALL OF SECTIONS 3, 10,
15, 22 & 27, TOWNSHIP 24 NORTH, RANGE
58 EAST, RICHLAND COUNTY, AT ANY
LOCATIONS NOT CLOSER THAN 200'
(HEEL/TOE SETBACKS) AND 500'
(LATERAL SETBACKS) TO THE
BOUNDARIES THEREOF, AND SUCH
OTHER AND FURTHER RELIEF AS THE
BOARD MAY DEEM APPROPRIATE.**

APPLICATION

MBOGC DOCKET NO. 446-2025

Phoenix Operating LLC ("Applicant"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, presents the following Application:

1. Applicant is the owner of oil and gas leasehold interests in, to and under the following described lands in Richland County:

Township 24 North, Range 58 East, MPM

Section 03: All

Section 10: All

Section 15: All

Section 22: All

Section 27: All

Containing 3,200 acres, more or less

2. Applicant requests an Order from this Board authorizing the drilling of and production of up to three (3) additional horizontal Bakken/Three Forks Formation wells within and upon the temporary spacing unit comprised of Sections 3, 10, 15, 22 and 27, Township 24 North, Range 58 East, and at any location not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks) to the exterior boundaries of said temporary spacing unit.
3. Applicant believes that approval and granting of the request herein will be in the best interest of prevention of waste of oil and associated natural gas and the conservation thereof and will not adversely affect the correlative rights of any interested party.

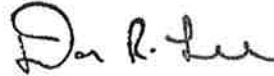
4. In the event an authorized well is completed as a well capable of commercial production of Bakken/Three Forks Formation oil and associated natural gas, Applicant will submit within ninety (90) days of first production from any such well an Application with this Board requesting the establishment of a permanent spacing unit therefore.

WHEREFORE, Applicant requests the following:

1. This matter be set for hearing by this Board and notice thereof be given as required by law;
2. After hearing this matter this Board enter its Order authorizing the Applicant to drill up to three (3) additional Bakken/Three Forks Formation wells within and upon the temporary spacing unit consisting of Sections 3, 10, 15, 22 and 27, Township 24 North, Range 58 East, but not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks) to the exterior boundaries of said temporary spacing unit;
3. Within ninety (90) days of first production from any authorized Bakken/Three Forks Formation well Applicant shall submit an Application to this Board requesting the establishment of a permanent spacing unit therefore; and
4. For such other or additional relief as this Board may deem appropriate.

Dated November 6, 2025.

LEE LAW OFFICE PC



By: _____

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

**IN THE MATTER OF THE APPLICATION
OF PHOENIX OPERATING LLC FOR AN
ORDER VACATING AND RESCINDING
BOARD ORDER NOS. 233-2012 AND 224-
2025, AND ADDITIONALLY DESIGNATING
AND DELINEATING A TEMPORARY
SPACING UNIT CONSISTING OF
SECTIONS 5, 8, 17, 20 & 29, TOWNSHIP 24
NORTH, RANGE 58 EAST, RICHLAND
COUNTY, AND AUTHORIZING THE
DRILLING OF AND PRODUCTION FROM
A HORIZONTAL BAKKEN/THREE FORKS
FORMATION WELL WITHIN AND UPON
THE REQUESTED TEMPORARY SPACING
UNIT AT ANY LOCATION NOT CLOSER
THAN 200' TO THE HEEL/TOE SETBACKS
AND 500' TO THE LATERAL SETBACKS
OF THE REQUESTED TEMPORARY
SPACING UNIT.**

APPLICATION

MBOGC DOCKET NO. 447 2025

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NOV 10 2025

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

Phoenix Operating LLC ("Applicant"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, presents the following Application:

1. Applicant is the owner of oil and gas leasehold interests in, to and under the following described lands in Richland County:

Township 24 North, Range 58 East, MPM

Section 5: All (216.12 acres)

Section 8: All

Section 17: All

Section 20: All

Section 29: All

Containing 2776.12 acres

2. Pursuant to Board Order No. 233-2012, dated June 14, 2012, this Board designated Sections 17 and 20, Township 24 North, Range 58 East, as a temporary spacing unit for the drilling of a Bakken/Three Forks Formation horizontal well.
3. Pursuant to Board Order No. 224-2025, dated October 9, 2025, this Board designated Sections 1 and 12, Township 24 North, Range 57 East and Sections 5, 6, 7, and 8, Township 24 North, Range 58 East, Richland County, Montana, as a temporary spacing unit for the drilling of a Bakken/Three Forks Formation horizontal well.

The proposed wells the subject of the above Orders have not been drilled nor have said Orders been vacated by this Board and for good cause Applicant requests the foregoing Orders be vacated and rescinded.

1. Applicant desires to drill a horizontal Bakken/Three Forks Formation well within and upon Sections 5, 8, 17, 20 and 29, Township 24 North, Range 58 East, and in order to more efficiently and economically recover Bakken/Three Forks oil and associated natural gas therefrom believes the temporary spacing unit therefore should consist of all of Sections 5, 8, 17, 20 and 29, Township 24 North, Range 58 East, containing 2776.12 acres.
2. Applicant believes the requested 200' heel/toe setbacks and 500' lateral setbacks from the requested spacing unit boundaries are necessary in order to adequately and efficiently increase the ultimate recovery of Bakken/Three Forks Formation oil and associated natural gas from the requested temporary spacing unit.
3. In the event Applicant's proposed horizontal Bakken/Three Forks Formation well referred to above is authorized by this Board and thereafter drilled and completed as a well capable of commercial production of Bakken/Three Forks Formation oil and associated natural gas, within ninety (90) days of such completion Applicant will file an appropriate Application with this Board requesting a permanent spacing unit for said well and Bakken/Three Forks Formation oil and associated natural gas produced therefrom.
4. Applicant believes that granting of the requests herein will serve to protect the correlative rights of all interested parties and will be in the best interest of prevention of waste and conservation of Bakken/Three Forks Formation oil and natural gas produced in association therewith.

WHEREFORE, Applicant requests the following:

1. This matter be set for hearing by the Board and notice thereof be given as required by law;
2. After hearing this matter this Board enter its Order vacating and rescinding Board Order Nos. 233-2012 and 224-2025 and terminating the temporary spacing units created thereby;
3. After hearing this matter the Board enter its Order designating Sections 5, 8, 17, 20 and 29, Township 24 North, Range 58 East, as a temporary spacing unit and authorizing Applicant to drill, complete and produce Bakken/Three Forks Formation oil and associated natural gas therefrom, provided that operations for the drilling of said well must commence within one (1) year of the date of the requested Order;

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GAS CONSERVATION • BILLINGS

4. Within ninety (90) days of first production from the requested authorized Bakken/Three Forks Formation well Applicant shall submit an Application to the Board requesting the establishment of a permanent spacing unit therefore and the production of Bakken/Three Forks Formation oil and associated natural gas therefrom; and
5. For such other or additional relief as the Board may deem appropriate.

Dated November 6, 2025

LEE LAW OFFICE PC



By: _____

Don R. Lee, Attorney for Applicant

Lee Law Office PC

158 Main Street – P.O. Box 790

Shelby, MT 59474

Telephone: (406) 434-5244

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NOV 10 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 PHOENIX OPERATING LLC FOR AN
ORDER VACATING AND RESCINDING
BOARD ORDER NO. 224-2025, AND
ADDITIONALLY DESIGNATING AND
DELINEATING AN OVERLAPPING
TEMPORARY SPACING UNIT
CONSISTING OF SECTIONS 6, 7, 18 & 19,
TOWNSHIP 24 NORTH, RANGE 58 EAST,
RICHLAND COUNTY, AND
AUTHORIZING THE DRILLING OF AND
PRODUCTION FROM A HORIZONTAL
BAKKEN/THREE FORKS FORMATION
WELL WITHIN AND UPON THE
REQUESTED OVERLAPPING
TEMPORARY SPACING UNIT AT ANY
LOCATION NOT CLOSER THAN 200' TO
THE HEEL/TOE SETBACKS AND 500' TO
THE LATERAL SETBACKS OF THE
REQUESTED OVERLAPPING
TEMPORARY SPACING UNIT.**

APPLICATION

MBOGC DOCKET NO. 448 2025

Phoenix Operating LLC ("Applicant"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, presents the following Application:

1. Applicant is the owner of oil and gas leasehold interests in, to and under the following described lands in Richland County:

Township 24 North, Range 58 East, MPM

Section 6: All (209.70 acres)

Section 7: All (622.40 acres)

Section 18: All (623.24 acres)

Section 19: All (624.08 acres)

Containing 2079.42 acres

2. Pursuant to Board Order No. 224-2025, dated October 9, 2025, this Board designated Sections 1 and 12, Township 24 North, Range 57 East and Sections 5, 6, 7, and 8, Township 24 North, Range 58 East, Richland County, Montana, as a temporary spacing unit for the drilling of a Bakken/Three Forks Formation horizontal well.

The proposed wells the subject of the above Order has not been drilled nor has said Order been vacated by this Board and for good cause Applicant requests the foregoing Order be vacated and rescinded.

1. Applicant desires to drill a horizontal Bakken/Three Forks Formation well within and upon Sections 6, 7, 18 and 19, Township 24 North, Range 58 East, and in order to more efficiently and economically recover Bakken/Three Forks oil and associated natural gas therefrom believes the overlapping temporary spacing unit therefore should consist of all of Sections 6, 7, 18 and 19, Township 24 North, Range 58 East, containing 2079.42 acres.
2. Applicant believes the requested 200' heel/toe setbacks and 500' lateral setbacks from the requested spacing unit boundaries are necessary in order to adequately and efficiently increase the ultimate recovery of Bakken/Three Forks Formation oil and associated natural gas from the requested overlapping temporary spacing unit.
3. In the event Applicant's proposed horizontal Bakken/Three Forks Formation well referred to above is authorized by this Board and thereafter drilled and completed as a well capable of commercial production of Bakken/Three Forks Formation oil and associated natural gas, within ninety (90) days of such completion Applicant will file an appropriate Application with this Board requesting a permanent spacing unit for said well and Bakken/Three Forks Formation oil and associated natural gas produced therefrom.
4. Applicant believes that granting of the requests herein will serve to protect the correlative rights of all interested parties and will be in the best interest of prevention of waste and conservation of Bakken/Three Forks Formation oil and natural gas produced in association therewith.

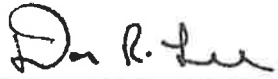
WHEREFORE, Applicant requests the following:

1. This matter be set for hearing by the Board and notice thereof be given as required by law;
2. After hearing this matter this Board enter its Order vacating and rescinding Board Order No. 224-2025 and terminating the temporary spacing units created thereby;
3. After hearing this matter the Board enter its Order designating Sections 6, 7, 18 and 19, Township 24 North, Range 58 East, as an overlapping temporary spacing unit and authorizing Applicant to drill, complete and produce Bakken/Three Forks Formation oil and associated natural gas therefrom, provided that operations for the drilling of said well must commence within one (1) year of the date of the requested Order;

4. Within ninety (90) days of first production from the requested authorized Bakken/Three Forks Formation well Applicant shall submit an Application to the Board requesting the establishment of a permanent spacing unit therefore and the production of Bakken/Three Forks Formation oil and associated natural gas therefrom; and
5. For such other or additional relief as the Board may deem appropriate.

Dated November 6, 2025

LEE LAW OFFICE PC

By: 
Don R. Lee, Attorney for Applicant
Lee Law Office PC
158 Main Street – P.O. Box 790
Shelby, MT 59474
Telephone: (406) 434-5244
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**BEFORE THE BOARD OF OIL AND GAS CONSERVATION
OF THE STATE OF MONTANA**

**IN THE MATTER OF THE
APPLICATION OF PHOENIX
OPERATING LLC FOR AN ORDER
VACATING AND RESCINDING BOARD
ORDER NO. 268-2014, 159-2024 & 160-
2024 AND ADDITIONALLY
DESIGNATING AND DELINEATING A
TEMPORARY SPACING UNIT
CONSISTING OF SECTIONS 4, 9, 16, 21
AND 28, TOWNSHIP 24 NORTH,
RANGE 58 EAST, RICHLAND COUNTY,
AND AUTHORIZING THE DRILLING
OF AND PRODUCTION FROM A
HORIZONTAL BAKKEN/THREE
FORKS FORMATION WELL WITHIN
AND UPON THE REQUESTED
TEMPORARY SPACING UNIT AT ANY
LOCATION NOT CLOSER THAN 200'
TO THE HEEL/TOE SETBACKS AND
500' TO THE LATERAL SETBACKS OF
THE REQUESTED TEMPORARY
SPACING UNIT.**

APPLICATION

MBOGC DOCKET NO. 449 - 2025

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MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

Phoenix Operating LLC ("Applicant"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, presents the following Application:

1. Applicant is the owner of oil and gas leasehold interests in, to and under the following described lands in Richland County:

Township 24 North, Range 58 East, MPM

Section 04: All

Section 09: All

Section 16: All

Section 21: All

Section 28: All

Containing 3,200 acres, more or less

2. Pursuant to Board Order No. 268-2014, dated August 14, 2014, this Board designated all of Sections 4, 9 and 16, Township 24 North, Range 58 East, as a temporary spacing unit for the drilling of a Bakken/Three Forks Formation horizontal well. The proposed well the subject of the foregoing Order was never drilled nor has said Order been vacated by this Board and for good cause Applicant requests this Order be vacated and rescinded.

3. Pursuant to Board Order No. 159-2024, dated December 5, 2024, this Board designated all of Sections 4, 9, 16 and 21, Township 24 North, Range 58 East, as a temporary spacing unit for the drilling of a Bakken/Three Forks Formation horizontal well. The proposed well the subject of the foregoing Order was never drilled nor has said Order been vacated by this Board and for good cause Applicant requests this Order be vacated and rescinded.
4. Pursuant to Board Order No. 160-2024, dated December 5, 2024, this Board authorized the drilling of up to three (3) additional horizontal Bakken/Three Forks Formation wells anywhere within the temporary spacing unit comprised of all of Sections 4, 9, 16 and 21, Township 24 North, Range 58 East. The proposed well the subject of the foregoing Order was never drilled nor has said Order been vacated by this Board and for good cause Applicant requests this Order be vacated and rescinded.
5. Applicant desires to drill a horizontal Bakken/Three Forks Formation well within and upon Sections 4, 9, 16, 21 and 28, Township 24 North, Range 58 East, and in order to more efficiently and economically recover Bakken/Three Forks oil and associated natural gas therefrom believes the temporary spacing unit therefore should consist of all of Sections 4, 9, 16, 21 and 28, Township 24 North, Range 58 East, containing 3,200 acres.
6. Applicant believes the requested 200' heel/toe setbacks and 500' lateral setbacks from the requested spacing unit boundaries are necessary in order to adequately and efficiently increase the ultimate recovery of Bakken/Three Forks Formation oil and associated natural gas from the requested temporary spacing unit.
7. In the event Applicant's proposed horizontal Bakken/Three Forks Formation well referred to above is authorized by this Board and thereafter drilled and completed as a well capable of commercial production of Bakken/Three Forks Formation oil and associated natural gas, within ninety (90) days of such completion Applicant will file an appropriate Application with this Board requesting a permanent spacing unit for said well and Bakken/Three Forks Formation oil and associated natural gas produced therefrom.
8. Applicant believes that granting of the requests herein will serve to protect the correlative rights of all interested parties and will be in the best interest of prevention of waste and conservation of Bakken/Three Forks Formation oil and natural gas produced in association therewith.

WHEREFORE, Applicant requests the following:

1. This matter be set for hearing by the Board and notice thereof be given as required by law;
2. After hearing this matter the Board enter its Order vacating and rescinding Board Order Nos. 268-2014, 159-2024 and 160-2024 and terminating the temporary spacing units created thereby and authorizing of the drilling of up to three (3) additional Bakken/Three Forks Formation wells;

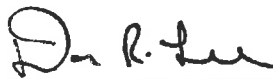
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3. After hearing this matter the Board enter its Order designating Sections 4, 9, 16, 21 and 28, Township 24 North, Range 58 East, as a temporary spacing unit and authorizing Applicant to drill, complete and produce Bakken/Three Forks Formation oil and associated natural gas therefrom, provided that operations for the drilling of said well must commence within one (1) year of the date of the requested Order;
4. Within ninety (90) days of first production from the requested authorized Bakken/Three Forks Formation well Applicant shall submit an Application to the Board requesting the establishment of a permanent spacing unit therefore and the production of Bakken/Three Forks Formation oil and associated natural gas therefrom; and
5. For such other or additional relief as the Board may deem appropriate.

Dated November 6, 2025.

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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 PHOENIX OPERATING LLC FOR AN
ORDER AUTHORIZING THE DRILLING
OF UP TO THREE (3) ADDITIONAL
HORIZONTAL BAKKEN/THREE FORKS
FORMATION WELLS WITHIN AND UPON
THE TEMPORARY SPACING UNIT
COMPRISED OF ALL OF SECTIONS 4, 9,
16, 21 & 28, TOWNSHIP 24 NORTH, RANGE
58 EAST, RICHLAND COUNTY, AT ANY
LOCATIONS NOT CLOSER THAN 200'
(HEEL/TOE SETBACKS) AND 500'
(LATERAL SETBACKS) TO THE
BOUNDARIES THEREOF, AND SUCH
OTHER AND FURTHER RELIEF AS THE
BOARD MAY DEEM APPROPRIATE.**

APPLICATION

MBOGC DOCKET NO. 450-2025

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

Phoenix Operating LLC ("Applicant"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, presents the following Application:

1. Applicant is the owner of oil and gas leasehold interests in, to and under the following described lands in Richland County:

Township 24 North, Range 58 East, MPM

Section 04: All

Section 09: All

Section 16: All

Section 21: All

Section 28: All

Containing 3,200 acres, more or less

2. Applicant requests an Order from this Board authorizing the drilling of and production of up to three (3) additional horizontal Bakken/Three Forks Formation wells within and upon the temporary spacing unit comprised of Sections 4, 9, 16, 21 and 28, Township 24 North, Range 58 East, and at any location not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks) to the exterior boundaries of said temporary spacing unit.
3. Applicant believes that approval and granting of the request herein will be in the best interest of prevention of waste of oil and associated natural gas and the conservation thereof and will not adversely affect the correlative rights of any interested party.

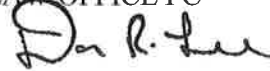
4. In the event an authorized well is completed as a well capable of commercial production of Bakken/Three Forks Formation oil and associated natural gas, Applicant will submit within ninety (90) days of first production from any such well an Application with this Board requesting the establishment of a permanent spacing unit therefore.

WHEREFORE, Applicant requests the following:

1. This matter be set for hearing by this Board and notice thereof be given as required by law;
2. After hearing this matter this Board enter its Order authorizing the Applicant to drill up to three (3) additional Bakken/Three Forks Formation wells within and upon the temporary spacing unit consisting of Sections 4, 9, 16, 21 and 28, Township 24 North, Range 58 East, but not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks) to the exterior boundaries of said temporary spacing unit;
3. Within ninety (90) days of first production from any authorized Bakken/Three Forks Formation well Applicant shall submit an Application to this Board requesting the establishment of a permanent spacing unit therefore; and
4. For such other or additional relief as this Board may deem appropriate.

Dated November 6, 2025.

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By: _____

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