

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

IN THE MATTER OF THE APPLICATION OF
CONTINENTAL RESOURCES INC. FOR AN ORDER
DESIGNATING A TEMPORARY SPACING UNIT
COMPRISED OF ALL OF SECTIONS 17, 20, 29 AND
32, TOWNSHIP 26 NORTH, RANGE 56 EAST,
RICHLAND COUNTY, MONTANA, AND
AUTHORIZING THE DRILLING OF A HORIZONTAL
BAKKEN/THREE FORKS FORMATION WELL
THEREON AT ANY LOCATION NOT CLOSER THAN
200 FEET FROM HEEL/TOE BOUNDARY AND 500
FEET FROM THE SIDE BOUNDARIES OF SAID
TEMPORARY SPACING UNIT, PROVIDED THAT
OPERATIONS FOR THE DRILLING OF SAID WELL
MUST COMMENCE WITHIN ONE YEAR OF THE
DATE OF THE ORDER ISSUED BY THE BOARD, THE
TEMPORARY SPACING UNIT SHALL BE LIMITED
TO PRODUCTION FROM THE PROPOSED
HORIZONTAL WELL AND APPLICANT WILL APPLY
FOR PERMANENT SPACING WITHIN 90 DAYS OF
SUCCESSFUL WELL COMPLETION.

MBOGC Docket No.

451-2025

AMENDED APPLICATION

APPLICANT FURTHER REQUESTS THAT BOARD
ORDER 2010-202 ESTABLISHING A TEMPORARY
SPACING UNIT COMPRISED OF ALL OF SECTIONS
17 AND 20, TOWNSHIP 26 NORTH, RANGE 56 EAST,
RICHLAND COUNTY, MONTANA BE VACATED.

CONTINENTAL RESOURCES, INC., 20 N. Broadway, Oklahoma City, OK 73102:

[A] Presents the following application:

1. Applicant is an interest owner and operator within Sections 17, 20, 29 and 32, Township 26 North, Range 56 East Richland County, Montana, which tracts are presently spaced with respect to the Bakken/Three Forks Formation by Order:
 - 202-2010 – creating a temporary spacing unit comprised of All of Sections 17 and 20, T26N, R56E.
2. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill a horizontal Bakken/Three Forks formation well within, but not closer than 200 feet to the heel/toe exterior boundaries and 500 feet to the lateral boundaries, of a temporary spacing unit ("TSU") comprised of All of Sections 17, 20, 29 and 32, Township 26 North, Range 56 East Richland County, Montana, subject to the conditions that applicant must commence said well within one year of the date of the order issued by the Board and that the temporary spacing unit be limited to production from the proposed horizontal well.
3. The proposed spacing unit contains the following Federal mineral lands
Township 26 North, Range 56 East
Section 17: W2NE, NENW, NWSE
Section 32: NESW

[B] Requests:

1. This matter be set for hearing and placed on the Docket, with notice given as required by law.

2. After hearing the matter, the Montana Board of Oil & Gas Conservation enter its order that a TSU comprised of All of Sections 17, 20, 29 and 32, Township 26 North, Range 56 East Richland County, Montana be established, subject to the condition that applicant must commence said well within one year of the date of the order issued by the Board;
3. Authorizing the Applicant to locate its proposed horizontal well anywhere within such TSU but not closer than 200 feet to the toe/heel boundaries and no further than 500 feet from the common boundary thereof.
4. Vacating Order 2010-202.

Dated November 10, 2025.

CONTINENTAL RESOURCES INC.

By Scotti Gray
Scotti Gray
Attorney for Applicant

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

IN THE MATTER OF THE APPLICATION OF CONTINENTAL RESOURCES INC. FOR AN ORDER DESIGNATING A TEMPORARY SPACING UNIT COMPRISED OF ALL OF SECTIONS 3, 10, 15 AND 22, TOWNSHIP 28 NORTH, RANGE 55 EAST, ROOSEVELT COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT ANY LOCATION NOT CLOSER THAN 200 FEET FROM HEEL/TOE BOUNDARY AND 500 FEET FROM THE SIDE BOUNDARIES OF SAID TEMPORARY SPACING UNIT, PROVIDED THAT OPERATIONS FOR THE DRILLING OF SAID WELL MUST COMMENCE WITHIN ONE YEAR OF THE DATE OF THE ORDER ISSUED BY THE BOARD, THE TEMPORARY SPACING UNIT SHALL BE LIMITED TO PRODUCTION FROM THE PROPOSED HORIZONTAL WELL AND APPLICANT WILL APPLY FOR PERMANENT SPACING WITHIN 90 DAYS OF SUCCESSFUL WELL COMPLETION.

MBOGC Docket No.

452 - 2025

AMENDED APPLICATION

CONTINENTAL RESOURCES, INC., 20 N. Broadway, Oklahoma City, OK 73102:

[A] Presents the following application:

1. Applicant is an interest owner and operator within Sections 3, 10, 15 and 22, Township 28 North, Range 55 East Roosevelt County, Montana, which tracts are presently unspaced with respect to the Bakken/Three Forks Formation by Order:
2. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill a horizontal Bakken/Three Forks formation well within, but not closer than 200 feet to the heel/toe exterior boundaries and 500 feet to the lateral boundaries, of a temporary spacing unit ("TSU") comprised of All of Sections 3, 10, 15 and 22, Township 28 North, Range 55 East Roosevelt County, Montana, subject to the conditions that applicant must commence said well within one year of the date of the order issued by the Board and that the temporary spacing unit be limited to production from the proposed horizontal well.
3. The proposed spacing unit contains the following Federal mineral lands:

Township 28 North, Range 55E

Section 10: SW

Section 15: All

[B] Requests:

1. This matter be set for hearing and placed on the Docket, with notice given as required by law.
2. After hearing the matter, the Montana Board of Oil & Gas Conservation enter its order that a TSU comprised of All of Sections 3, 10, 15 and 22, Township 28 North, Range 55 East Roosevelt County, Montana be established, subject to the condition that applicant must commence said well within one year of the date of the order issued by the Board;

3. Authorizing the Applicant to locate its proposed horizontal well anywhere within such TSU but not closer than 200 feet to the toe/heel boundaries and no further than 500 feet from the common boundary thereof;

Dated November 10, 2025.

CONTINENTAL RESOURCES INC.

By Scotti Gray
Scotti Gray
Attorney for Applicant

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

IN THE MATTER OF THE APPLICATION
OF CONTINENTAL RESOURCES INC.
FOR AUTHORIZATION TO DRILL UP TO
THREE ADDITIONAL HORIZONTAL
BAKKEN/THREE FORKS FORMATION
WELL IN THE SPACING UNIT
COMPRISED OF ALL OF SECTIONS 3,
10, 15 AND 22, TOWNSHIP 28 NORTH,
RANGE 55 EAST ROOSEVELT COUNTY,
MONTANA, AT ANY LOCATION NOT
CLOSER THAN 500 FEET TO THE SIDE
BOUNDARIES AND 200 FEET TO THE
TOE/HEEL BOUNDARIES OF SAID
SPACING UNIT

MBOGC Docket No.

453-2025

AMENDED APPLICATION

CONTINENTAL RESOURCES, INC., 20 N. Broadway, Oklahoma City, OK 73102:

[A] Presents the following application:

1. Applicant is an interest owner and operator within the above-described lands:
2. The above-described lands are presently subject to a pending application to designate a temporary spacing unit ("TSU") comprised of said lands and authorize the drilling of a well in the TSU.
3. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill up to three additional horizontal Bakken/Three Forks formation wells within, but not closer than 500 feet to the side boundaries and 200 feet to the toe/heel boundaries of the spacing unit.
4. The proposed spacing unit contains the following Federal mineral lands:

Township 28 North, Range 55E

Section 10: SW

Section 15: All

[B] Requests:

1. This matter be set for hearing and placed on the Docket, with notice given as required by law.
2. After hearing the matter, the Board enter its order authorizing applicant to drill up to three additional horizontal Bakken/Three Forks formation wells within, but not closer than 500 feet to the side boundaries and 200 feet to the toe/heel boundaries of the spacing unit.

November 10, 2025.

CONTINENTAL RESOURCES INC.

By

Scotti Gray
Scotti Gray
Attorney for Applicant

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

IN THE MATTER OF THE APPLICATION OF CONTINENTAL RESOURCES INC. FOR AN ORDER DESIGNATING A TEMPORARY SPACING UNIT COMPRISED OF ALL OF SECTIONS 1, 12, 13 AND 24, TOWNSHIP 28 NORTH, RANGE 55 EAST, ROOSEVELT COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT ANY LOCATION NOT CLOSER THAN 200 FEET FROM HEEL/TOE BOUNDARY AND 500 FEET FROM THE SIDE BOUNDARIES OF SAID TEMPORARY SPACING UNIT, PROVIDED THAT OPERATIONS FOR THE DRILLING OF SAID WELL MUST COMMENCE WITHIN ONE YEAR OF THE DATE OF THE ORDER ISSUED BY THE BOARD, THE TEMPORARY SPACING UNIT SHALL BE LIMITED TO PRODUCTION FROM THE PROPOSED HORIZONTAL WELL AND APPLICANT WILL APPLY FOR PERMANENT SPACING WITHIN 90 DAYS OF SUCCESSFUL WELL COMPLETION.

MBOGC Docket No.

454-2025

AMENDED APPLICATION

APPLICANT FURTHER REQUESTS THAT BOARD ORDER 2011-344 ESTABLISHING A TEMPORARY SPACING UNIT COMPRISED OF ALL OF SECTIONS 1 AND 12, TOWNSHIP 28 NORTH, RANGE 55 EAST, ROOSEVELT COUNTY, MONTANA BE VACATED.

APPLICANT FURTHER REQUESTS THAT BOARD ORDER 2010-18 ESTABLISHING A TEMPORARY SPACING UNIT COMPRISED OF ALL OF SECTIONS 13 AND 24, TOWNSHIP 28 NORTH, RANGE 55 EAST, ROOSEVELT COUNTY, MONTANA BE VACATED.

CONTINENTAL RESOURCES, INC., 20 N. Broadway, Oklahoma City, OK 73102:

[A] Presents the following application:

1. Applicant is an interest owner and operator within Sections 1, 12, 13 and 24, Township 28 North, Range 55 East Roosevelt County, Montana, which tracts are presently spaced with respect to the Bakken/Three Forks Formation by Orders:
 - 344-2011 – creating a temporary spacing unit comprised of All of Sections 1 and 12, T28N, R55E.
 - 18-2010 – creating a temporary spacing unit comprised of All of Sections 13 and 24, T28N, R55E.
2. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill a horizontal Bakken/Three Forks formation well within, but not closer than 200 feet to the heel/toe exterior boundaries and 500 feet to the lateral boundaries, of a temporary spacing unit ("TSU") comprised of All of Sections 1, 12, 13 and 24, Township 28 North, Range 55 East Roosevelt County, Montana, subject to the conditions that applicant must commence said well within one year of the date of the order issued by the Board and that the temporary spacing unit be limited to production from the proposed horizontal well.

[B] Requests:

1. This matter be set for hearing and placed on the Docket, with notice given as required by law.
2. After hearing the matter, the Montana Board of Oil & Gas Conservation enter its order that a TSU comprised of All of Sections 1, 12, 13 and 24, Township 28 North, Range 55 East Roosevelt County, Montana be established, subject to the condition that applicant must commence said well within one year of the date of the order issued by the Board;
3. Authorizing the Applicant to locate its proposed horizontal well anywhere within such TSU but not closer than 200 feet to the toe/heel boundaries and no further than 500 feet from the common boundary thereof;
4. Vacating Orders 2011-³~~7~~44 and 2010-18.

Dated November 10, 2025.

CONTINENTAL RESOURCES INC.

By Scotti Gray
Scotti Gray
Attorney for Applicant

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

IN THE MATTER OF THE APPLICATION
OF CONTINENTAL RESOURCES INC.
FOR AUTHORIZATION TO DRILL UP TO
THREE ADDITIONAL HORIZONTAL
BAKKEN/THREE FORKS FORMATION
WELL IN THE SPACING UNIT
COMPRISED OF ALL OF SECTIONS 1,
12, 13 AND 24, TOWNSHIP 28 NORTH,
RANGE 55 EAST ROOSEVELT COUNTY,
MONTANA, AT ANY LOCATION NOT
CLOSER THAN 500 FEET TO THE SIDE
BOUNDARIES AND 200 FEET TO THE
TOE/HEEL BOUNDARIES OF SAID
SPACING UNIT

MBOGC Docket No.

455-2025

AMENDED APPLICATION

CONTINENTAL RESOURCES, INC., 20 N. Broadway, Oklahoma City, OK 73102:

[A] Presents the following application:

1. Applicant is an interest owner and operator within the above-described lands:
2. The above-described lands are presently subject to a pending application to designate a temporary spacing unit ("TSU") comprised of said lands and authorize the drilling of a well in the TSU.
3. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill up to three additional horizontal Bakken/Three Forks formation wells within, but not closer than 500 feet to the side boundaries and 200 feet to the toe/heel boundaries of the spacing unit.

[B] Requests:

1. This matter be set for hearing and placed on the Docket, with notice given as required by law.
2. After hearing the matter, the Board enter its order authorizing applicant to drill up to three additional horizontal Bakken/Three Forks formation wells within, but not closer than 500 feet to the side boundaries and 200 feet to the toe/heel boundaries of the spacing unit.

November 10, 2025.

CONTINENTAL RESOURCES INC.

By


Scotti Gray
Attorney for Applicant

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

IN THE MATTER OF THE APPLICATION OF CONTINENTAL RESOURCES INC. FOR AN ORDER DESIGNATING A TEMPORARY SPACING UNIT COMPRISED OF ALL OF SECTIONS 2, 11, 14 AND 23, TOWNSHIP 28 NORTH, RANGE 55 EAST, ROOSEVELT COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT ANY LOCATION NOT CLOSER THAN 200 FEET FROM HEEL/TOE BOUNDARY AND 500 FEET FROM THE SIDE BOUNDARIES OF SAID TEMPORARY SPACING UNIT, PROVIDED THAT OPERATIONS FOR THE DRILLING OF SAID WELL MUST COMMENCE WITHIN ONE YEAR OF THE DATE OF THE ORDER ISSUED BY THE BOARD, THE TEMPORARY SPACING UNIT SHALL BE LIMITED TO PRODUCTION FROM THE PROPOSED HORIZONTAL WELL AND APPLICANT WILL APPLY FOR PERMANENT SPACING WITHIN 90 DAYS OF SUCCESSFUL WELL COMPLETION.

MBOGC Docket No.

456-2025

AMENDED APPLICATION

APPLICANT FURTHER REQUESTS THAT BOARD ORDER 2010-61 ESTABLISHING A TEMPORARY SPACING UNIT COMPRISED OF ALL OF SECTIONS 14 AND 23, TOWNSHIP 28 NORTH, RANGE 55 EAST, ROOSEVELT COUNTY, MONTANA BE VACATED.

CONTINENTAL RESOURCES, INC., 20 N. Broadway, Oklahoma City, OK 73102:

[A] Presents the following application:

1. Applicant is an interest owner and operator within Sections 2, 11, 14 and 23, Township 28 North, Range 55 East Roosevelt County, Montana, which tracts are presently unspaced with respect to the Bakken/Three Forks Formation by Order:
 - 61-2010 – creating a temporary spacing unit comprised of All of Sections 14 and 23, T28N, R55E.
2. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill a horizontal Bakken/Three Forks formation well within, but not closer than 200 feet to the heel/toe exterior boundaries and 500 feet to the lateral boundaries, of a temporary spacing unit ("TSU") comprised of All of Sections 2, 11, 14 and 23, Township 28 North, Range 55 East Roosevelt County, Montana, subject to the conditions that applicant must commence said well within one year of the date of the order issued by the Board and that the temporary spacing unit be limited to production from the proposed horizontal well.
3. The proposed spacing unit contains the following Federal mineral lands

 Township 28 North, Range 55 East
 Section 11: SW
 Section 14: N2NW

[B] Requests:

1. This matter be set for hearing and placed on the Docket, with notice given as required by law.

2. After hearing the matter, the Montana Board of Oil & Gas Conservation enter its order that a TSU comprised of All of Sections 2, 11, 14 and 23, Township 28 North, Range 55 East Roosevelt County, Montana be established, subject to the condition that applicant must commence said well within one year of the date of the order issued by the Board;
3. Authorizing the Applicant to locate its proposed horizontal well anywhere within such TSU but not closer than 200 feet to the toe/heel boundaries and no further than 500 feet from the common boundary thereof.
4. Vacating Order 2010-61.

Dated November 10, 2025.

CONTINENTAL RESOURCES INC.

By Scotti Gray
Scotti Gray
Attorney for Applicant

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

IN THE MATTER OF THE APPLICATION
OF CONTINENTAL RESOURCES INC.
FOR AUTHORIZATION TO DRILL UP TO
THREE ADDITIONAL HORIZONTAL
BAKKEN/THREE FORKS FORMATION
WELL IN THE SPACING UNIT
COMPRISED OF ALL OF SECTIONS 2,
11, 14 AND 23, TOWNSHIP 28 NORTH,
RANGE 55 EAST ROOSEVELT COUNTY,
MONTANA, AT ANY LOCATION NOT
CLOSER THAN 500 FEET TO THE SIDE
BOUNDARIES AND 200 FEET TO THE
TOE/HEEL BOUNDARIES OF SAID
SPACING UNIT

MBOGC Docket No.

457-2025

AMENDED APPLICATION

CONTINENTAL RESOURCES, INC., 20 N. Broadway, Oklahoma City, OK 73102:

[A] Presents the following application:

1. Applicant is an interest owner and operator within the above-described lands:
2. The above-described lands are presently subject to a pending application to designate a temporary spacing unit ("TSU") comprised of said lands and authorize the drilling of a well in the TSU.
3. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill up to three additional horizontal Bakken/Three Forks formation wells within, but not closer than 500 feet to the side boundaries and 200 feet to the toe/heel boundaries of the spacing unit.
4. The proposed spacing unit contains the following Federal mineral lands

Township 28 North, Range 55 East

Section 11: SW

Section 14: N2NW

[B] Requests:

1. This matter be set for hearing and placed on the Docket, with notice given as required by law.
2. After hearing the matter, the Board enter its order authorizing applicant to drill up to three additional horizontal Bakken/Three Forks formation wells within, but not closer than 500 feet to the side boundaries and 200 feet to the toe/heel boundaries of the spacing unit.

November 10, 2025.

CONTINENTAL RESOURCES INC.

By

Scotti Gray
Scotti Gray

Attorney for Applicant

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

IN THE MATTER OF THE APPLICATION OF CONTINENTAL RESOURCES INC. FOR AN ORDER DESIGNATING A TEMPORARY SPACING UNIT COMPRISED OF ALL OF SECTIONS 6, 7, 18 AND 19, TOWNSHIP 28 NORTH, RANGE 56 EAST, ROOSEVELT COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT ANY LOCATION NOT CLOSER THAN 200 FEET FROM HEEL/TOE BOUNDARY AND 500 FEET FROM THE SIDE BOUNDARIES OF SAID TEMPORARY SPACING UNIT, PROVIDED THAT OPERATIONS FOR THE DRILLING OF SAID WELL MUST COMMENCE WITHIN ONE YEAR OF THE DATE OF THE ORDER ISSUED BY THE BOARD, THE TEMPORARY SPACING UNIT SHALL BE LIMITED TO PRODUCTION FROM THE PROPOSED HORIZONTAL WELL AND APPLICANT WILL APPLY FOR PERMANENT SPACING WITHIN 90 DAYS OF SUCCESSFUL WELL COMPLETION.

MBOGC Docket No.

459 - 2025

AMENDED APPLICATION

APPLICANT FURTHER REQUESTS THAT BOARD ORDER 2011-345 ESTABLISHING A TEMPORARY SPACING UNIT COMPRISED OF ALL OF SECTIONS 6 AND 7, TOWNSHIP 28 NORTH, RANGE 56 EAST, ROOSEVELT COUNTY, MONTANA BE VACATED.

APPLICANT FURTHER REQUESTS THAT BOARD ORDER 2011-3 ESTABLISHING A TEMPORARY SPACING UNIT COMPRISED OF ALL OF SECTIONS 18 AND 19, TOWNSHIP 28 NORTH, RANGE 56 EAST, ROOSEVELT COUNTY, MONTANA BE VACATED.

CONTINENTAL RESOURCES, INC., 20 N. Broadway, Oklahoma City, OK 73102:

[A] Presents the following application:

1. Applicant is an interest owner and operator within Sections 6, 7, 18 and 19, Township 28 North, Range 56 East Roosevelt County, Montana, which tracts are presently spaced with respect to the Bakken/Three Forks Formation by Order:
 - 345-2011 – creating a temporary pacing unit comprised of All of Sections 6 and 7, T28N, R56E.
 - 3 -2011 – creating a temporary pacing unit comprised of All of Sections 18 and 19, T28N, R56E.
2. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill a horizontal Bakken/Three Forks formation well within, but not closer than 200 feet to the heel/toe exterior boundaries and 500 feet to the lateral boundaries, of a temporary spacing unit ("TSU") comprised of All of Sections 4, 9, 16 and 21, Township 28 North, Range 56 East Roosevelt County, Montana, subject to the conditions that applicant must commence said well within one year of the date of the order issued by the Board and that the temporary spacing unit be limited to production from the proposed horizontal well.
3. The proposed spacing unit contains the following federal mineral lands:

Township 28 North, Range 56 East
Section 18: SWSE

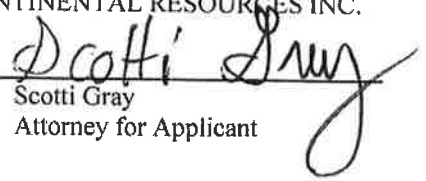
[B] Requests:

1. This matter be set for hearing and placed on the Docket, with notice given as required by law.
2. After hearing the matter, the Montana Board of Oil & Gas Conservation enter its order that a TSU comprised of All of Sections 6, 7, 18 and 19, Township 28 North, Range 56 East Roosevelt County, Montana, Montana be established, subject to the condition that applicant must commence said well within one year of the date of the order issued by the Board;
3. Authorizing the Applicant to locate its proposed horizontal well anywhere within such TSU but not closer than 200 feet to the toe/heel boundaries and no further than 500 feet from the common boundary thereof;
4. Vacating Orders 2011-345 and 2011-3.

Dated November 10, 2025.

CONTINENTAL RESOURCES INC.

By


Scotti Gray

Attorney for Applicant

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

IN THE MATTER OF THE APPLICATION
OF CONTINENTAL RESOURCES INC.
FOR AUTHORIZATION TO DRILL UP TO
THREE ADDITIONAL HORIZONTAL
BAKKEN/THREE FORKS FORMATION
WELL IN THE SPACING UNIT
COMPRISED OF ALL OF SECTIONS 6, 7,
18 AND 19, TOWNSHIP 28 NORTH,
RANGE 56 EAST ROOSEVELT COUNTY,
MONTANA, AT ANY LOCATION NOT
CLOSER THAN 500 FEET TO THE SIDE
BOUNDARIES AND 200 FEET TO THE
TOE/HEEL BOUNDARIES OF SAID
SPACING UNIT

MBOGC Docket No.

459-2025

AMENDED APPLICATION

CONTINENTAL RESOURCES, INC., 20 N. Broadway, Oklahoma City, OK 73102:

[A] Presents the following application:

1. Applicant is an interest owner and operator within the above-described lands:
2. The above-described lands are presently subject to a pending application to designate a temporary spacing unit ("TSU") comprised of said lands and authorize the drilling of a well in the TSU.
3. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill up to three additional horizontal Bakken/Three Forks formation wells within, but not closer than 500 feet to the side boundaries and 200 feet to the toe/heel boundaries of the spacing unit.
4. The proposed spacing unit contains the following federal mineral lands:

Township 28 North, Range 56 East
Section 18: SWSE

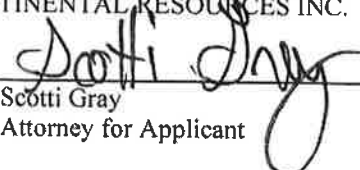
[B] Requests:

1. This matter be set for hearing and placed on the Docket, with notice given as required by law.
2. After hearing the matter, the Board enter its order authorizing applicant to drill up to three additional horizontal Bakken/Three Forks formation wells within, but not closer than 500 feet to the side boundaries and 200 feet to the toe/heel boundaries of the spacing unit.

November 10, 2025.

CONTINENTAL RESOURCES INC.

By


Scotti Gray

Attorney for Applicant

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

IN THE MATTER OF THE APPLICATION OF CONTINENTAL RESOURCES INC. FOR AN ORDER DESIGNATING A TEMPORARY SPACING UNIT COMPRISED OF ALL OF SECTIONS 4, 9, 16 AND 21, TOWNSHIP 28 NORTH, RANGE 56 EAST, ROOSEVELT COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT ANY LOCATION NOT CLOSER THAN 200 FEET FROM HEEL/TOE BOUNDARY AND 500 FEET FROM THE SIDE BOUNDARIES OF SAID TEMPORARY SPACING UNIT, PROVIDED THAT OPERATIONS FOR THE DRILLING OF SAID WELL MUST COMMENCE WITHIN ONE YEAR OF THE DATE OF THE ORDER ISSUED BY THE BOARD, THE TEMPORARY SPACING UNIT SHALL BE LIMITED TO PRODUCTION FROM THE PROPOSED HORIZONTAL WELL AND APPLICANT WILL APPLY FOR PERMANENT SPACING WITHIN 90 DAYS OF SUCCESSFUL WELL COMPLETION.

MBOGC Docket No. 460-2025

AMENDED APPLICATION

APPLICANT FURTHER REQUESTS THAT BOARD ORDER 2010-19 ESTABLISHING A TEMPORARY SPACING UNIT COMPRISED OF ALL OF SECTIONS 4 AND 9, TOWNSHIP 28 NORTH, RANGE 56 EAST, ROOSEVELT COUNTY, MONTANA BE VACATED.

CONTINENTAL RESOURCES, INC., 20 N. Broadway, Oklahoma City, OK 73102:

[A] Presents the following application:

1. Applicant is an interest owner and operator within Sections 4, 9, 16 and 21, Township 28 North, Range 56 East Roosevelt County, Montana, which tracts are presently spaced with respect to the Bakken/Three Forks Formation by Order:
 - 19-2010 – creating a temporary spacing unit comprised of All of Sections 4 and 9, T28N, R56E.
2. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill a horizontal Bakken/Three Forks formation well within, but not closer than 200 feet to the heel/toe exterior boundaries and 500 feet to the lateral boundaries, of a temporary spacing unit ("TSU") comprised of All of Sections 4, 9, 16 and 21, Township 28 North, Range 56 East Roosevelt County, Montana, subject to the conditions that applicant must commence said well within one year of the date of the order issued by the Board and that the temporary spacing unit be limited to production from the proposed horizontal well.
3. The proposed spacing unit contains the following Federal mineral lands:

Township 28 North, Range 56 East
Section 9: NESE

[B] Requests:

1. This matter be set for hearing and placed on the Docket, with notice given as required by law.
2. After hearing the matter, the Montana Board of Oil & Gas Conservation enter its order that a TSU comprised of All of Sections 4, 9, 16 and 21, Township 28 North, Range 56 East Roosevelt County, Montana be established, subject to the condition that applicant must commence said well within one year of the date of the order issued by the Board;

3. Authorizing the Applicant to locate its proposed horizontal well anywhere within such TSU but not closer than 200 feet to the toe/heel boundaries and no further than 500 feet from the common boundary thereof;
4. Vacating Order 2010-19.

Dated November 10, 2025.

CONTINENTAL RESOURCES INC.

By Scotti Gray
Scotti Gray
Attorney for Applicant

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

IN THE MATTER OF THE APPLICATION
OF CONTINENTAL RESOURCES INC.
FOR AUTHORIZATION TO DRILL UP TO
THREE ADDITIONAL HORIZONTAL
BAKKEN/THREE FORKS FORMATION
WELL IN THE SPACING UNIT
COMPRISED OF ALL OF SECTIONS 4, 9,
16 AND 21, TOWNSHIP 28 NORTH,
RANGE 56 EAST ROOSEVELT COUNTY,
MONTANA, AT ANY LOCATION NOT
CLOSER THAN 500 FEET TO THE SIDE
BOUNDARIES AND 200 FEET TO THE
TOE/HEEL BOUNDARIES OF SAID
SPACING UNIT

MBOGC Docket No.

461-2025

AMENDED APPLICATION

CONTINENTAL RESOURCES, INC., 20 N. Broadway, Oklahoma City, OK 73102:

[A] Presents the following application:

1. Applicant is an interest owner and operator within the above-described lands:
2. The above-described lands are presently subject to a pending application to designate a temporary spacing unit ("TSU") comprised of said lands and authorize the drilling of a well in the TSU.
3. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill up to three additional horizontal Bakken/Three Forks formation wells within, but not closer than 500 feet to the side boundaries and 200 feet to the toe/heel boundaries of the spacing unit.
4. The proposed spacing unit contains the following Federal mineral lands:

Township 28 North, Range 56 East
Section 9: NESE

[B] Requests:

1. This matter be set for hearing and placed on the Docket, with notice given as required by law.
2. After hearing the matter, the Board enter its order authorizing applicant to drill up to three additional horizontal Bakken/Three Forks formation wells within, but not closer than 500 feet to the side boundaries and 200 feet to the toe/heel boundaries of the spacing unit.

November 10, 2025.

CONTINENTAL RESOURCES INC.

By

Scotti Gray
Scotti Gray

Attorney for Applicant

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

IN THE MATTER OF THE APPLICATION OF CONTINENTAL RESOURCES INC. FOR AN ORDER DESIGNATING A TEMPORARY SPACING UNIT COMPRISED OF ALL OF SECTIONS 5, 8, 17 AND 20, TOWNSHIP 25 NORTH, RANGE 56 EAST, RICHLAND COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT ANY LOCATION NOT CLOSER THAN 200 FEET FROM HEEL/TOE BOUNDARY AND 500 FEET FROM THE SIDE BOUNDARIES OF SAID TEMPORARY SPACING UNIT, PROVIDED THAT OPERATIONS FOR THE DRILLING OF SAID WELL MUST COMMENCE WITHIN ONE YEAR OF THE DATE OF THE ORDER ISSUED BY THE BOARD, THE TEMPORARY SPACING UNIT SHALL BE LIMITED TO PRODUCTION FROM THE PROPOSED HORIZONTAL WELL AND APPLICANT WILL APPLY FOR PERMANENT SPACING WITHIN 90 DAYS OF SUCCESSFUL WELL COMPLETION.

MBOGC Docket No.

462-2025

APPLICATION

APPLICANT FURTHER REQUESTS THAT BOARD ORDER 2011-359 ESTABLISHING A TEMPORARY SPACING UNIT COMPRISED OF ALL OF SECTIONS 5 AND 8, TOWNSHIP 25 NORTH, RANGE 56 EAST, RICHLAND COUNTY, MONTANA BE VACATED.

APPLICANT FURTHER REQUESTS THAT BOARD ORDER 2006-116 ESTABLISHING A TEMPORARY SPACING UNIT COMPRISED OF ALL OF SECTIONS 19 AND 20, TOWNSHIP 25 NORTH, RANGE 56 EAST, RICHLAND COUNTY, MONTANA BE VACATED.

CONTINENTAL RESOURCES, INC., 20 N. Broadway, Oklahoma City, OK 73102:

[A] Presents the following application:

1. Applicant is an interest owner and operator within Sections 5, 8, 17 and 20, Township 25 North, Range 56 East Richland County, Montana, which tracts are presently spaced with respect to the Bakken/Three Forks Formation by Orders:
 - 359-2011 – creating a temporary spacing unit comprised of All of Sections 5 and 8, T25N, R56E.
 - 116-2006 – creating a temporary spacing unit comprised of All of Sections 19 and 20, T25N, R56E.
2. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill a horizontal Bakken/Three Forks formation well within, but not closer than 200 feet to the heel/toe exterior boundaries and 500 feet to the lateral boundaries, of a temporary spacing unit ("TSU") comprised of All of Sections 5, 8, 17 and 20, Township 25 North, Range 56 East Richland County, Montana, subject to the conditions that applicant must commence said well within one year of the date of the order issued by the Board and that the temporary spacing unit be limited to production from the proposed horizontal well.


[B] Requests:

1. This matter be set for hearing and placed on the Docket, with notice given as required by law.
2. After hearing the matter, the Montana Board of Oil & Gas Conservation enter its order that a TSU comprised of All of Sections 5, 8, 17 and 20, Township 25 North, Range 56 East Richland County, Montana be established, subject to the condition that applicant must commence said well within one year of the date of the order issued by the Board;
3. Authorizing the Applicant to locate its proposed horizontal well anywhere within such TSU but not closer than 200 feet to the toe/heel boundaries and no further than 500 feet from the common boundary thereof;
4. Vacating Orders 2011-359 and 2006-116.

Dated November 6, 2025.

CONTINENTAL RESOURCES INC.

By


Scotti Gray

Attorney for Applicant

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

IN THE MATTER OF THE APPLICATION
OF CONTINENTAL RESOURCES INC.
FOR AUTHORIZATION TO DRILL UP TO
THREE ADDITIONAL HORIZONTAL
BAKKEN/THREE FORKS FORMATION
WELL IN THE SPACING UNIT
COMPRISED OF ALL OF SECTIONS 5, 8,
17 AND 20, TOWNSHIP 25 NORTH,
RANGE 56 EAST RICHLAND COUNTY,
MONTANA, AT ANY LOCATION NOT
CLOSER THAN 500 FEET TO THE SIDE
BOUNDARIES AND 200 FEET TO THE
TOE/HEEL BOUNDARIES OF SAID
SPACING UNIT

MBOGC Docket No. 463-2025

AMENDED APPLICATION

CONTINENTAL RESOURCES, INC., 20 N. Broadway, Oklahoma City, OK 73102:

[A] Presents the following application:

1. Applicant is an interest owner and operator within the above-described lands:
2. The above-described lands are presently subject to a pending application to designate a temporary spacing unit ("TSU") comprised of said lands and authorize the drilling of a well in the TSU.
3. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill up to three additional horizontal Bakken/Three Forks formation wells within, but not closer than 500 feet to the side boundaries and 200 feet to the toe/heel boundaries of the spacing unit.

[B] Requests:

1. This matter be set for hearing and placed on the Docket, with notice given as required by law.
2. After hearing the matter, the Board enter its order authorizing applicant to drill up to three additional horizontal Bakken/Three Forks formation wells within, but not closer than 500 feet to the side boundaries and 200 feet to the toe/heel boundaries of the spacing unit.

November 10, 2025.

CONTINENTAL RESOURCES INC.

By

Scotti Gray
Scotti Gray

Attorney for Applicant

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

IN THE MATTER OF THE APPLICATION
OF CONTINENTAL RESOURCES INC.
FOR AUTHORIZATION TO DRILL UP TO
ONE ADDITIONAL HORIZONTAL
BAKKEN/THREE FORKS FORMATION
WELL IN THE SPACING UNIT
COMPRISED OF ALL OF SECTIONS 4, 9,
16 AND 21, TOWNSHIP 25 NORTH,
RANGE 56 EAST RICHLAND COUNTY,
MONTANA, AT ANY LOCATION NOT
CLOSER THAN 500 FEET TO THE SIDE
BOUNDARIES AND 200 FEET TO THE
TOE/HEEL BOUNDARIES OF SAID
SPACING UNIT

MBOGC Docket No.

464-2025

AMENDED APPLICATION

CONTINENTAL RESOURCES, INC., 20 N. Broadway, Oklahoma City, OK 73102:

[A] Presents the following application:

1. Applicant is an interest owner and operator within the above-described lands:
2. The above-described lands are subject to an order designating a temporary spacing unit ("TSU") comprised of said lands and authorizing the drilling of a well in the TSU. The above-described lands are also subject to an order authorizing the drilling of two additional wells in the TSU.
3. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill up to one additional horizontal Bakken/Three Forks formation well within, but not closer than 500 feet to the side boundaries and 200 feet to the toe/heel boundaries of the spacing unit.

[B] Requests:

1. This matter be set for hearing and placed on the Docket, with notice given as required by law.
2. After hearing the matter, the Board enter its order authorizing applicant to drill up to one additional horizontal Bakken/Three Forks formation well within, but not closer than 500 feet to the side boundaries and 200 feet to the toe/heel boundaries of the spacing unit.

November 10, 2025.

CONTINENTAL RESOURCES INC.

By


Scotti Gray
Attorney for Applicant

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



GREG GIANFORTE, GOVERNOR

OIL AND GAS CONSERVATION DIVISION

STATE OF MONTANA

October 10, 2025

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

Re: Demand For Opportunity To Be Heard

Dear Kraken Operating, LLC:

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

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

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

Sincerely,

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

Benjamin Jones
Administrator / Petroleum Engineer

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

465-2025

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

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

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



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

October 8, 2025

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

Attention: Ben Jones, Administrator/Petroleum Engineer

Re: Demand for Opportunity to be Heard

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

Dear Mr. Jones:

Pursuant to A.R.M. 36.22.601(6), Phoenix Operating LLC ("Phoenix"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, hereby demands a hearing on the Kraken Operating LLC ("Kraken") Application for Permit to Drill ("APD") a horizontal Bakken/Three Forks Formation well with a surface location within and upon Lot 4 of Section 31, Township 28 North, Range 57 East, and a bottom hole location within and upon the Lot 1 of Section 18, Township 28 North, Range 57 East. The referenced surface hole location and bottom hole location are in Roosevelt County. The proposed well the subject of the APD is more specifically identified on Exhibit "A" attached to this correspondence and by reference incorporated herein.

The proposed well, which is the subject of the foregoing APD severely impacts the development plans of Phoenix, whose plans are more beneficial to mineral owners and the State of Montana than Kraken's plans. The temporary spacing unit for Kraken's proposed well commingles a virgin 1,280-acre section with a producing 1,280-acre section in essence disrupting proper spacing patterns. Phoenix strongly believes Kraken should not be authorized to drill into 1,280 acres in which Phoenix owns in excess of eighty-two and nine-tenths percent (82.9%) of the working interest. In fact, Phoenix has reason to believe that it owns more working interest in this four-section spacing unit than Kraken.

Phoenix has definite capital backed plans to drill four horizontal wells within the four-section spacing unit in succession, whereas Kraken only plans to drill one well in a four mile spacing unit and no more indefinitely. Phoenix plans for full development, benefiting mineral owners by protecting correlative rights, preventing waste and benefiting the State of Montana by increasing severance taxes. Particularly in light of their surface location, where Kraken intends to drill four (4), four-mile horizontal laterals from one 40 acre parcel, north and south, it is abundantly clear that Kraken's plans are to hold maximum amount acreage with the minimal amount of development which benefits no one but Kraken. Phoenix intends to drill four wells from this four-section spacing unit alone, which benefits mineral owners, the State Montana and Phoenix, as well as other working interest owners. Phoenix will be filing its own APD for this four-section spacing unit within the next 60-90 days.

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

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

Sincerely,

LEE LAW OFFICE PC

By: 

Don R. Lee

CERTIFICATE OF SERVICE

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

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

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

By: 

Karen L. Young, Paralegal

Notice of Application

Published in Helena Independent Record on September 30, 2025

EXHIBIT "A"

Location

Lewis and Clark County, Montana

Notice Text

Public Notice

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

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

1. Name and address of Applicant:

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

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

Surface Loc: Lot 4 Section 31, T28N, R57E, Roosevelt County, MT.
Footages: 413' FSL & 374' FWL Et: 2101'

Bottom Hole Loc: Lot 1 Section 18, T28N, R57E, Roosevelt County, MT.
Footages: 205' FNL & 650' FWL

3. Total Depth Proposed to be Drilled:

31,052 Measured Depth, 9,987 TVD

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

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

Office: (406) 656-0040

Fax: (406) 655-8015

September 30, 2025 COL-MT-201542 MNAXLP

465-2025

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



GREG GIANFORTE, GOVERNOR

OIL AND GAS CONSERVATION DIVISION

STATE OF MONTANA

October 10, 2025

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

Re: Demand For Opportunity To Be Heard

Dear Kraken Operating, LLC:

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

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

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

Sincerely,

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

Benjamin Jones
Administrator / Petroleum Engineer

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

466-2025

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

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

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



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

October 8, 2025

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

Attention: Ben Jones, Administrator/Petroleum Engineer

Re: Demand for Opportunity to be Heard

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

Dear Mr. Jones:

Pursuant to A.R.M. 36.22.601(6), Phoenix Operating LLC ("Phoenix"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, hereby demands a hearing on the Kraken Operating LLC ("Kraken") Application for Permit to Drill a horizontal Bakken/Three Forks Formation well with a surface location within and upon Lot 4 of Section 31, Township 28 North, Range 57 East, and a bottom hole location within and upon the NE $\frac{1}{4}$ NE $\frac{1}{4}$ of Section 13, Township 28 North, Range 56 East. The referenced surface hole location and bottom hole location are in Roosevelt County. The proposed well the subject of the APD is more specifically identified on Exhibit "A" attached to this correspondence and by reference incorporated herein.

The proposed well, which is the subject of the foregoing APD severely impacts the development plans of Phoenix, whose plans are more beneficial to mineral owners and the State of Montana than Kraken's plans. The temporary spacing unit for Kraken's proposed well commingles a virgin 1,280-acre section with producing 1,280-acre section in essence disrupting proper spacing patterns. Phoenix strongly believes Kraken should not be authorized to drill into 1,280 acres in which Phoenix owns in excess of ninety percent (90%) of the working interest. In fact, Phoenix has reason to believe that it owns more working interest in this four-section spacing unit than Kraken.

Phoenix has definite capital backed plans to drill four horizontal wells within the four-section spacing unit in succession, whereas Kraken only plans to drill one well in a four-mile spacing unit and no more indefinitely. Phoenix plans for full development, benefiting mineral owners by protecting correlative rights, preventing waste and benefiting the State of Montana by increasing severance taxes. Particularly in light of their surface location, where Kraken intends to drill four (4), four-mile horizontal laterals from one 40 acre parcel, north and south, it is abundantly clear that Kraken's plans are to hold maximum amount acreage with the minimal amount of development which benefits no one but Kraken. Phoenix intends to drill four wells from this four-section spacing unit alone, which benefits mineral owners, the State Montana and Phoenix, as well as other working interest owners. Phoenix will be filing its own APD for this 2,560-acre spacing unit within the next 60-90 days.

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

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

Sincerely,

LEE LAW OFFICE PC

By:


Don R. Lee

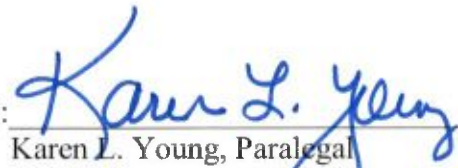
CERTIFICATE OF SERVICE

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

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

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

By:


Karen L. Young, Paralegal

Notice of Application

EXHIBIT "A"

Published in Helena Independent Record on September 30, 2025

Location

Lewis and Clark County, Montana

Notice Text

Public Notice

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

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

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

1. Name and address of Applicant:

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

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

Surface Loc: Lot 4 Section 31, T28N, R57E, Roosevelt County, MT.
Footages: 380' FSL & 374' FWL Et 2101'

Bottom Hole Loc: NENE Section 13, T28N, R56E, Roosevelt County, MT. Footages: 205' FNL & 600' FEL

3. Total Depth Proposed to be Drilled:

31,174 Measured Depth, 9,982 TVD

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

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

Office: (406) 656-0040

Fax: (406) 655-6015

September 30, 2025 CO1-MT-201545 MNAXLR

466-2025

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



GREG GIANFORTE, GOVERNOR

OIL AND GAS CONSERVATION DIVISION

STATE OF MONTANA

November 14, 2025

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

Re: Demand For Opportunity to Be Heard

Dear Heritage Energy Operating LLC:

This letter is regarding a demand for opportunity to be heard that was filed in accordance with ARM 36.22.601 concerning Heritage Energy Operating, LLC's (Heritage) published notifications of the E. Poff Trust 13-12-1 2H, E. Poff Trust 13-12-1 3H, and the E. Poff Trust 13-12-1 4H well applications for permits to drill in Roosevelt County, Montana.

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

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

Sincerely,

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

Benjamin Jones
Administrator / Petroleum Engineer

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

467-2025

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

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

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



November 4, 2025

RECEIVED

NOV 07 2025

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

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

Attention: Ben Jones, Administrator/Petroleum Engineer

**Re: *Permit Protest re In the Matter of E. Poff Trust 13-12-1 1H,
Heritage Energy Operating LLC, for a Renewal of Permit to
Drill an Oil and Gas Well***

Dear Mr. Jones:

Phoenix Operating LLC ("Phoenix"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, hereby protests and requests a hearing on the Application of Heritage Energy Operating LLC ("Heritage") for a renewal of the Permit to Drill the E. Poff Trust 13-12-1 1H in all of Sections 1, 12, and 13, Township 25 North, Range 56 East, Richland County, Montana on the following grounds:

1. Phoenix owns an estimated 62.33% working interest in Sections 1, 12 and 13, 51.03% working interest in Sections 3, 10 and 15, and 25.73% working interest in Sections 2, 11 and 14, all in Township 25 North, Range 56 East, Richland County, Montana.
2. Phoenix protests on the basis that awarding a permit to drill to Heritage for a spacing unit comprised of all of Sections 1, 12, and 13 T25N, R56E (Order 47-2025) does not promote the most orderly and efficient development of the oil and gas resource and may result in economic and physical waste as well as a violation of correlative rights to the owners of the surrounding area.
3. Phoenix plans to drill four wells in a spacing unit comprised of all of Sections 1, 12, and 13, T25N, R56E, four wells in a spacing unit comprised of all of Sections 2, 11, and 14 T25N, R56E, and four wells in a spacing unit comprised of all of Sections 3, 10 and 15, T25N, R56E, all in the year 2026. Phoenix's

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

4. Heritage has recently submitted additional permits to drill additional wells within these spacing units, even though it has not utilized its expired or expiring permits. Allowing Heritage to proceed with the proposed permits encumbers nine sections with permits that may never be utilized, or underutilized by unknown third parties by, for example, drilling only one well within each spacing unit, and waiting for an indefinite future time while additional permits are applied for renewal, or not utilized.
5. Heritage has permitted no less than 11 wells in the State of Montana with renewing 9 of those 11 permits, and to date has drilled zero wells, and has obtained no production.
6. In contrast, Phoenix plans for full development, benefiting mineral owners by protecting correlative rights, preventing waste and benefiting the State of Montana by increasing severance taxes. Phoenix intends to drill four wells from this spacing unit alone, which benefits mineral owners, the State Montana and Phoenix, as well as other working interest owners. Phoenix's usual mode of operation is to drill as many wells as are allowable under spacing orders in succession in Montana and North Dakota.
7. The E. Poff Trust 13-12-1 1H permit has been active since July 24, 2025. Heritage has had time to drill the E. Poff Trust 13-12-1 1H well. Heritage's failure to develop under the E. Poff Trust 13-12-1 1H while requesting a renewal of this permit and submission of additional permits while failing to drill is a deterrent to development, makes development more expensive by driving up the costs of development by a third party, and does not promote the conservation of oil and gas, the prevention of waste, or the protection of correlative rights.
8. Upon information and belief, it is Phoenix's understanding that Heritage has no intention of drilling and operating the E. Poff Trust 13-12-1 1H well; rather to obtain an acreage position through the permitting process and to flip the acreage to a third party.
9. Phoenix will be filing its own APDs for the spacing units referenced above before the Board's December hearing and in time for the Board to review Phoenix's plans in contrast to Heritage's.

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NOV 07 2025

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

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

Sincerely,

LEE LAW OFFICE PC

By: _____

Don R. Lee

DRL/kly

RECEIVED

NOV 07 2025

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

CERTIFICATE OF SERVICE

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

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

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

By:


Karen L. Young, Paralegal

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MONTANA BOARD OF O
GAS CONSERVATION • BILLING



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

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

Attention: Ben Jones, Administrator/Petroleum Engineer

Re: Demand for Opportunity to be Heard

***Heritage Energy Operating, LLC Application for Permit
to Drill – E. Poff Trust 13-12-1 2H***

Dear Mr. Jones:

Pursuant to A.R.M. 36.22.601(6), Phoenix Operating LLC (“Phoenix”), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, hereby demands a hearing before the Board of Oil and Gas Conservation of the State of Montana (“Board”) on the Heritage Energy Operating LLC (“Heritage”) Application for Permit to Drill (“APD”) a horizontal Bakken/Three Forks Formation well with a surface location within and upon SE¼SW¼ of Section 13, Township 25 North, Range 56 East, and a bottom hole location within and upon the NW¼NW¼ of Section 1, Township 25 North, Range 56 East, being the E. Poff Trust 13-12-1 2H well (“Proposed Subject Well”). The referenced surface hole location and bottom hole location are in Richland County. The Proposed Subject Well is more specifically identified on Exhibit “A” attached to this correspondence and by reference incorporated herein.

Heritage has an existing permit in this drilling and spacing unit consisting of all of Sections 1, 12 and 13 in Township 25 North, Range 56 East by Commission Order No. 47-2025 (“DSU”) being the for the E. Poff Trust 13-12-1 1H well (API No. 25-083-23508-00-00). Heritage has not utilized this existing permit and upon information and belief has no intention of drilling its existing permit which expires January 24, 2026. Heritage should not be rewarded with more permits, when it has not utilized the permit it currently holds. In fact Heritage has permitted no less than 11 wells in the State of Montana with renewing 9 of those 11 permits, and to date has drilled zero wells, and has

467-2025

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

In contrast, Phoenix currently owns 62.33% of the working interest in the DSU with plans to acquire more. Phoenix has definite capital backed plans to drill four horizontal wells within the DSU in succession in 2026. Phoenix plans for full development, benefiting mineral owners by protecting correlative rights, preventing waste and benefiting the State of Montana by increasing severance taxes. Phoenix intends to drill four wells from this DSU alone, which benefits mineral owners, the State Montana and Phoenix, as well as other working interest owners. Phoenix's usual mode of operation is to drill as many wells as are allowable under spacing orders in succession in Montana and North Dakota. Phoenix will be filing its own APDs for the DSU before the Board's December hearing and in time for the Board to review Phoenix's plans in contrast to Heritage's. The Proposed Subject Well severely impacts the development plans of Phoenix, which plans are more beneficial to mineral owners and the State of Montana than Heritage's plans.

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

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

Sincerely,

LEE LAW OFFICE PC

By:


Don R. Lee

DRL/kly

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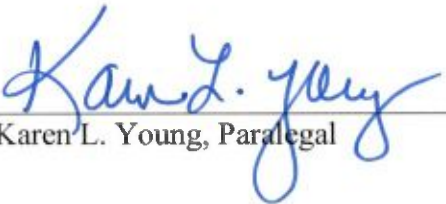
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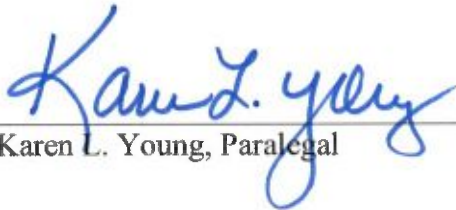
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