



Continental
RESOURCES

**MBOGC
Business Meeting**

***Williston Extended
Reach Lateral History &
Industry Benchmarking***

Leo Lasecki
April 8, 2026

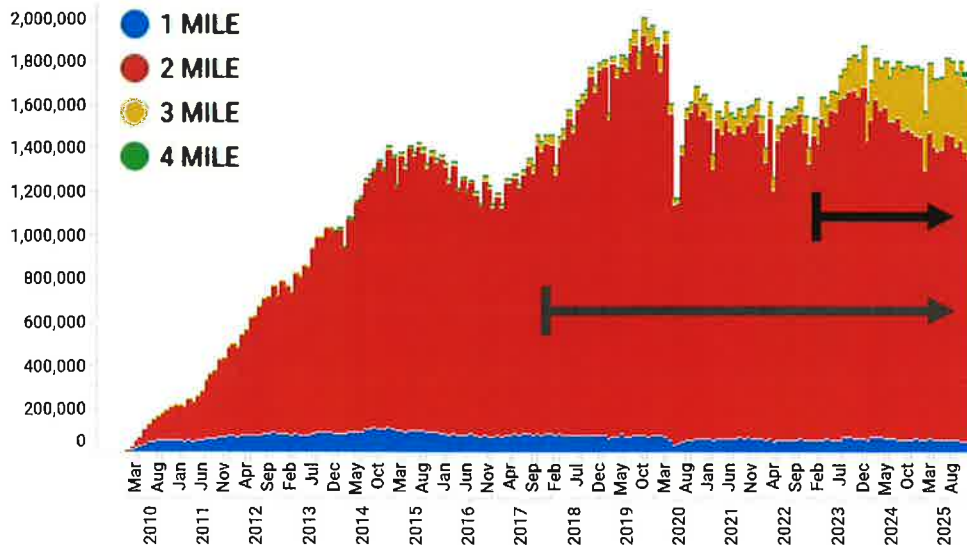


Williston Basin: History of Extended Reach Laterals

Increased emphasis on extended reach laterals in recent years

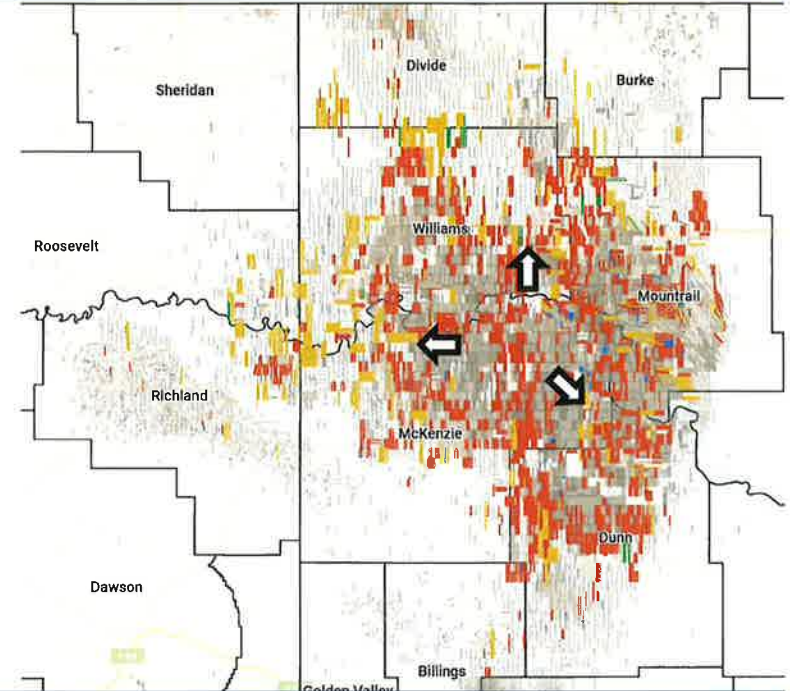
- **Historical** commodity price context
 - ✓ Improved capital efficiency
- Increasingly **challenged** petrophysical properties
 - ✓ More per well volume, despite reduced HCIPs
- **Improving** technical and operational best practices
 - ✓ Industry continues to push the limits

Gross Production BOEPD – 2010 to 2025

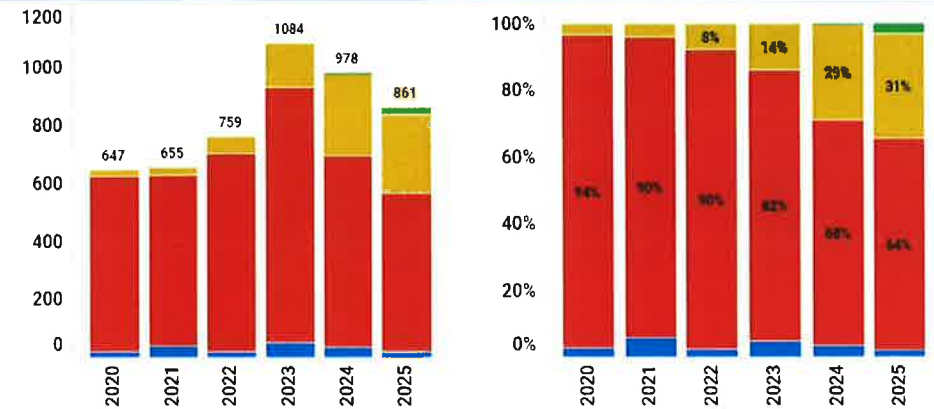


Basin Map – 2020 to Present

- 1 MILE
- 2 MILE
- 3 MILE
- 4 MILE
- PRE-2020



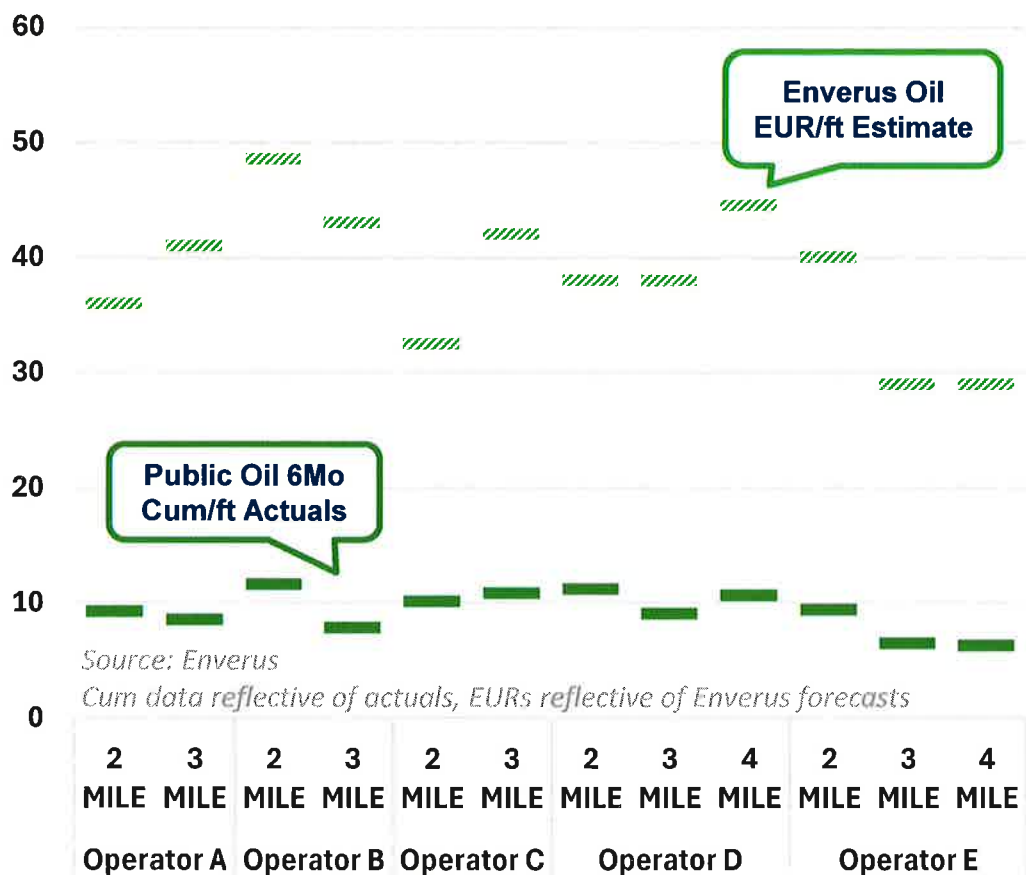
Producing Lateral Length Count & %-Mix



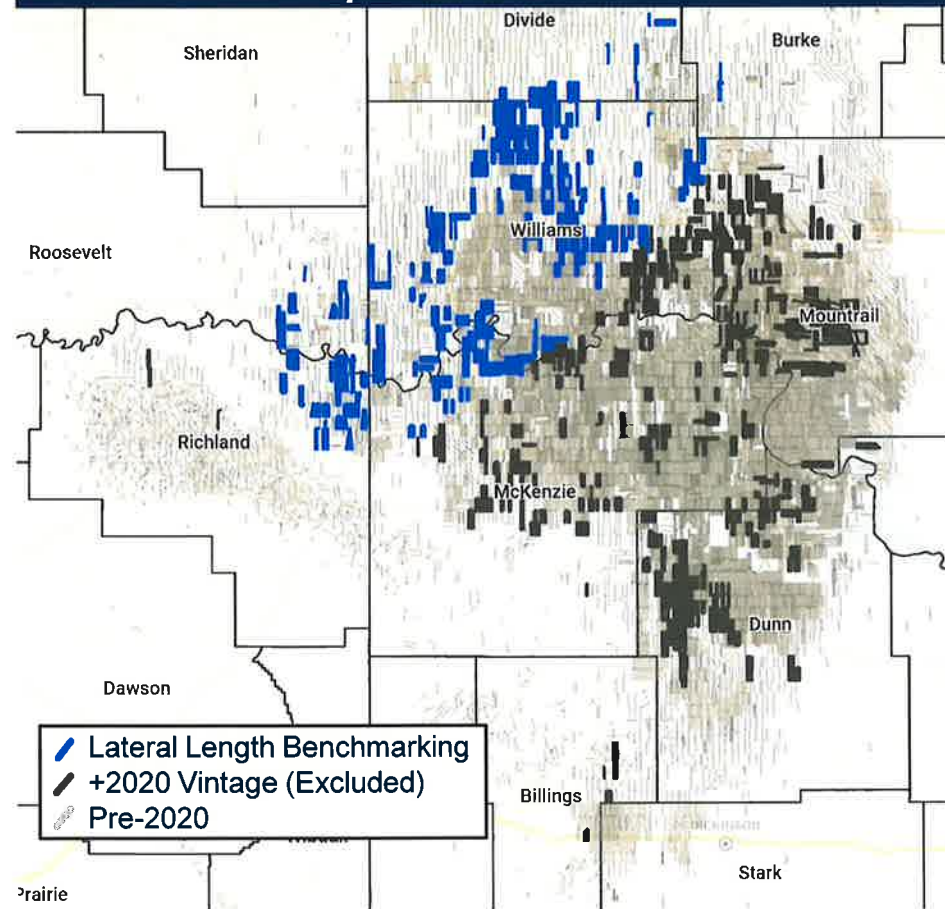
Williston Basin: Extended Reach Lateral Benchmarking

Current Trends

Lateral Length Benchmarking



Basin Map – Selection Well Set



- Selected modern wells (2020 & Newer) with at least 6 months of actual data
- Regional NW trend of the Williston Basin—agnostic to spacing or completions variances
- Limited to diverse operator group that comprises majority of extended reach activity

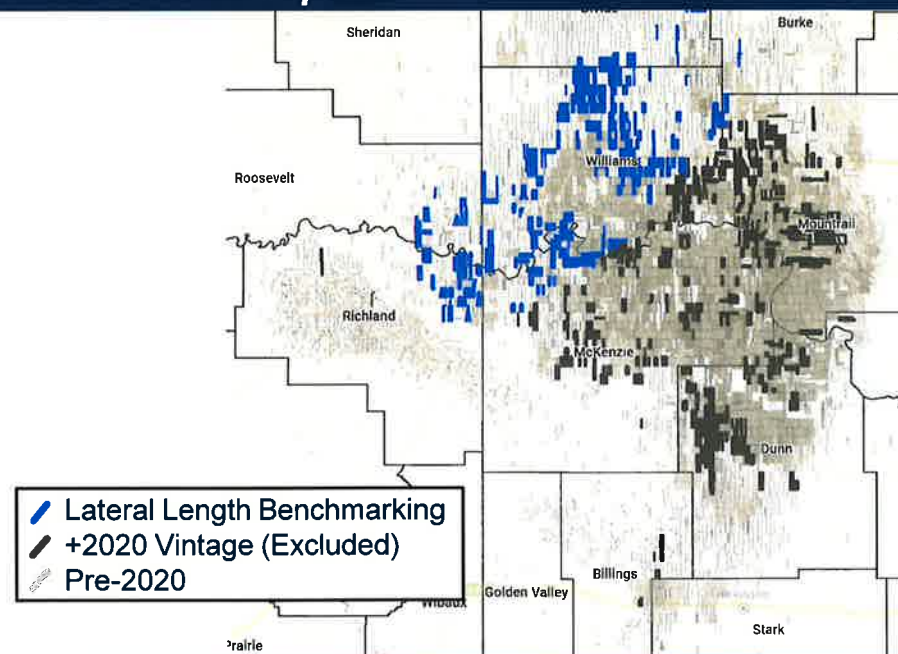
Williston Basin: Adoption of Extended Reach Laterals

Key Considerations

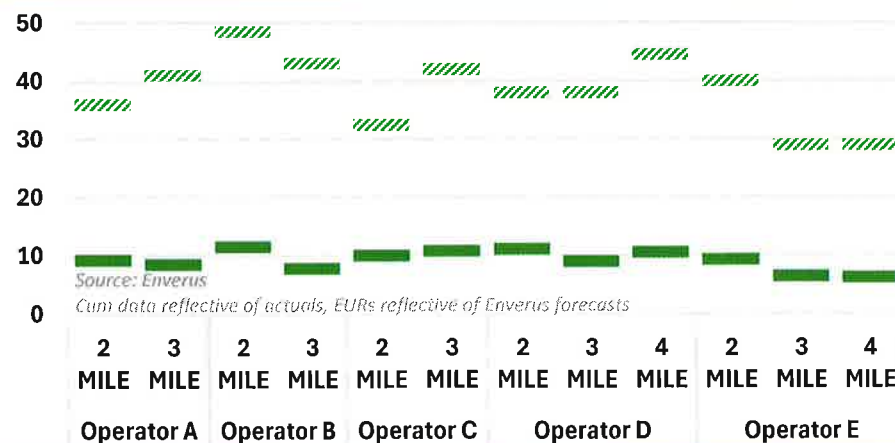
Extended Lateral Development

- ❑ What does success look like?
- ❑ Adequate testing and engineering controls necessary for reliable execution and long-term adoption
- ❑ Key technical considerations:
 - Drilling
 - Cone of uncertainty
 - Optimal casing and hole size
 - Mechanical isolation
 - Completion
 - Hydraulic limitations
 - Stimulation efficiencies across lateral
 - Adequate plug drill-out
 - Production & Facilities
 - Properly sized artificial lift
 - Long-term well maintenance
 - Takeaway capacity

Basin Map – Selection Well Set




Lateral Length Benchmarking





 2535 St. Johns Avenue
Billings, MT 59102

 (406) 656-0040

 Dnrc.mt.gov/BOGC

DATE: February 24, 2026

TO: Operators

FROM: Montana Board of Oil & Gas Conservation

RE: Request for Public Comment on Temporary Spacing and Permitting

The Montana Board of Oil and Gas Conservation is currently reviewing certain procedural practices related to Temporary Spacing Unit (TSU) orders, associated timing language, petitions to vacate, and drilling permits and subsequent renewals. The Board is soliciting input from operators to ensure that any clarification or policy refinement promotes orderly development, regulatory certainty, protection of correlative rights, and appropriate finality of Board decisions.

The Board requests input on the following issues:

1. Timing Language in TSU Orders

Many TSU orders historically include language requiring that operations for the commencement of drilling occur within one year of the date of the order.

- How do operators interpret this language?
- What regulatory purpose do you believe it currently serves?
- Should the Board continue including this language in modern TSU orders, modify it, or eliminate it?
- If retained, how should its effect be defined?

2. Duration and Finality of TSU Orders

- How long should a TSU order remain in effect before the Board entertains a petition to vacate it in favor of an alternative development proposal?
- Should the passage of time or non-development constitute grounds for reconsideration?
- What standards should apply before reconsideration of a spacing determination that was previously approved after notice and hearing?



3. Drilling Permit Duration and Renewal

Drilling permits are valid for six months, with the original operator typically given preference upon renewal.

- Under what circumstances, if any, should another operator be allowed to compete for the permit location upon renewal?
- When would it be appropriate to allow protest of a permit renewal?
- Should preference to the original operator continue absent materially changed circumstances?

The Board's objective is not to restrict lawful development but to ensure that its procedures remain clear, consistent, and aligned with statutory mandates, including prevention of waste, protection of correlative rights, protection of the environment, and orderly development of Montana's oil and gas resources.

Please submit written comments by March 25, 2026, to allow the Board time to review them prior to discussion at the April 8, 2026, business meeting. Written comments may be submitted by mail or by email to mtogpub@mt.gov. In-person comments will also be considered, as time allows, at the April 8th meeting.

We appreciate your thoughtful input on these matters.

Sincerely,



Ben Jones
Administrator

Montana Board of Oil and Gas Conservation



United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Montana/Dakotas State Office
5001 Southgate Drive
Billings, Montana 59101
<http://www.blm.gov/montana-dakotas>



March 16, 2026

Mr. Ben Jones
MBOGC
2535 St. Johns Avenue
Billings, MT 59102

Dear Mr. Jones:

Thank you for the opportunity to provide comments in response to the February 24, 2026 request regarding temporary spacing and permitting of oil and gas wells.

The presence of Tribal and Federal mineral estates within Montana frequently places operators in situations where dual APD approvals from both the State of Montana and the Bureau of Land Management (BLM) are required. A Federal APD is necessary whenever a wellbore will penetrate Federal or Tribal lands. Under 43 CFR § 3171.14, Federal APDs are valid for four years from the approval date and require a non-refundable fee of \$12,850 in FY26. If the corresponding State APD expires or the operator loses authority to drill, the BLM generally will not issue a refund. Since January 1, 2025, the average processing time for Federal APDs in Montana has been approximately 60 days, with roughly 45 of those days attributed to operator-driven corrections of application deficiencies.

Federal APD regulations under 43 CFR § 3171.14 were updated in 2025 to address several scenarios previously adjudicated through the Interior Board of Land Appeals. It may be beneficial for the State to consider these same scenarios proactively to provide regulatory clarity and consistency. Specifically:

1. Under State regulations, when does an APD expire if operations have commenced?
2. How is "commencement of operations" defined?
3. Can an operator take any action on the day of expiration to extend the APD's validity, and how should such action be documented?

These federal updates were intended to address drilled but non completed wells, partially drilled wells, and wells actively being drilled when an APD reaches its expiration date.

The BLM would welcome the opportunity for further discussion and appreciate the continued productive relationship with the MBOGC. If you have any questions, please contact Tyler Croft at (406 896-5035) or (tcroft@blm.gov).

Sincerely,

TYLER CROFT

Digitally signed
by TYLER CROFT
Date: 2026.03.24
15:29:40 -06'00'

Tyler Croft
Petroleum Engineer
MT/DK's BLM State Office

Enclosure(s) 43 CFR § 3171.14

§ 3171.14 Valid Period of Approved APD.

(a) For APDs approved on or after July 4, 2025, an APD approval is valid for a single 4-year period from the date that it is approved, or until lease expiration, whichever occurs first.

(b) Notwithstanding paragraph (a) of this section, if an APD approval expires by reason other than lease expiration, the APD approval shall remain valid if the operator or lessee:

(1) Has drilled the well to the approximate total measured depth in the approved APD, including wells drilled to the approximate total measured depth and not yet completed;

(2) Is drilling the well with a rig capable of drilling the well to the proposed total measured depth in the approved APD; or

(3) Has set the surface casing for the well and has submitted a plan, approved by the BLM prior to expiration of the APD approval, for continuously drilling the well to reach the proposed total measured depth in the approved APD. The plan must include the timeframe for continuously drilling and completing the well and any extenuating circumstances that may delay the continuous drilling and completion of the well.

(c) If, upon expiration of the approved APD, the operator created surface disturbance or began drilling the well under the approved APD, the operator or lessee must either comply with all applicable plugging, abandonment, and reclamation requirements or submit a new APD covering the existing disturbance.

(d) The operator is responsible for reclaiming any surface disturbance that resulted from its actions, even if a well was not drilled. Earthwork for reclamation must be completed within 6 months of APD expiration (weather permitting).

(e) The valid period for an approved APD on a lease suspended under subpart 3103 will be adjusted to account for the suspension. Beginning on the date the suspension is lifted, the valid period of the approved APD will be extended by the time that was remaining on the term of the approved APD on the effective date of the suspension.

March 25, 2026

VIA EMAIL

Mr. Ben Jones, Administrator
Board of Oil & Gas Conservation
2535 St. Johns Avenue
Billings, Montana 59102-4693
bjones@mt.gov

Re: Response to Board's February 24, 2026 Request for Public Comment on Temporary Spacing and Permitting.

Dear Ben:

On behalf of John and I, below please find our responses to Board's February 24, 2026 request for comment. In summary, absent extraordinary circumstances, we believe two years is the minimum amount of time necessary to adequately gauge whether a company is taking steps toward diligent development of a spacing unit. After two years, if the company's development plan is challenged, then the Board should consider all facts and evidence to determine whether the company with the originally approved order (or permit) has taken reasonable steps toward development of the spacing unit. If a company has spent time and resources toward development, such as obtaining surface use agreement(s), obtaining title opinion(s), entering into midstream or other development contracts and/or started building location, etc., then the company needs certainty that their right to develop is not going to be stripped away.

Over the past 18-months, the most common question we've been asked is whether there is certainty that the company's spacing order and/or drilling permit will be extended. The question is asked because the company is planning to spend a significant amount of money to enter into contracts, build location and/or obtain necessary permits. To date the Board has been reasonable, examined the totality of the evidence on a case-by-case basis, and has demonstrated that it will not deny a spacing order extension or APD extension when it is clear the company has taken / is taking steps to develop. To the extent the Board wants a clear review process in a policy or rule, that is of course difficult given the case-by-case differences that we are seeing. Therefore, it will require flexibility such as a totality of the circumstances standard where the Board continues examining all facts presented to determine whether approving the extension application or competing application better fulfills the Board's statutory mandates.

1. **Timing Language in TSU Orders** (many TSU orders historically include language requiring that operations for the commencement of drilling occur within one year of the date of the order).

- **How do operators interpret this language?**
 - Currently, we interpret this language as automatically terminating the TSU Order at the end of the 1-year term, absent automatic extension (commencement of adequate operations) or an extension order by the Board. Although the 1-year was originally tied to setbacks for 1280s, we no longer read the Order language this way. The language seems to be consistently included in Orders regardless of the lateral setback. For example, in Orders 129, 130, 134 and 136-2025, the Orders require 200' / 1,320' setbacks but still include the 1-year language.

- **What regulatory purpose do you believe it currently serves?**
 - In our opinion, the regulatory purpose has changed since one company started challenging TSU Orders. As above, historically, my understanding was that it offered protection to offset owners by allowing 1-year for the operator to drill wells within the approved 500' setback. After 1-year the setbacks automatically terminated and spacing setbacks reverted. Currently, we view the purpose as having shifted to more due process and administrative efficiency to: (1) allow a party wanting to file a competing application a time certain for when they can file the same, and (2) allow the party who obtained the original order at least one-year to focus on development without the consistent need to appear before the Board and fend off competing applications.

- **Should the Board continue including this language in modern TSU orders, modify it, or eliminate it?**
 - We do not think the language in the order is necessary, as long as there is a time certain that a third party cannot file an application to vacate the spacing order (preferably 2 years). If the Board eliminates the language without a clear policy on timing to vacate, then it could lead to a company filing new applications and requests to vacate approved orders whenever it wants. As we have seen this past year, allowing a company to constantly challenge recent spacing orders creates administrative and operator uncertainty, is a waste of administrative resources, and requires companies to prepare for and defend futile applications. If the Board elects to keep the language, it should be modified to make the intent clear – does the TSU expire after the year(s)? If not, what happens at the end of the time period must be clear.

- **If retained, how should its effect be defined?**
 - We'll leave this up to the individual operators. If the Board elects to retain the language, we would like to review and opine on any draft language, if possible. But again, we think the biggest concerns are (1) making sure the rug is not pulled out from an operator that has spent significant time and resources on diligently working toward drilling a well, regardless of timing; and (2) making sure the Board is not even docketing cases requesting that the Board vacate a temporary spacing order (within the 1 or 2 year window) absent extraordinary circumstances.

2. Duration and Finality of TSU Orders

- **How long should a TSU order remain in effect before the Board entertains a petition to vacate it in favor of an alternative development proposal?**
 - For TSUs/OTSUs without existing PSUs/Wells underlying all or some part of the spaced area: Two years seems like a fair amount of time for the Board to entertain an application for an alternative development proposal.

For TSUs/OTSUs with existing PSUs/Wells underlying all or some part of the spaced area: In this case, the Board should continue to recognize the existing operations and investment of the operator of the existing wells and continue to apply the Bison standard, absent extraordinary circumstances.

- **Should the passage of time or non-development constitute grounds for reconsideration?**
 - Subject to the above (PSU areas vs non-PSU areas) we do think the passage of time *along with non-development* should constitute grounds for reconsideration. After 2-years, if a third party challenges the original order and presents a new development plan, then the holder of the original temporary spacing application could appear before the Board and discuss what steps it has taken, if any, toward diligent development (obtaining agreements/contracts, obtaining a title opinion, building location / roads, applying for or obtaining state and federal APDs, events slowing development beyond their reasonable control such as federal permitting approval, drilling stipulations in federal leases, etc.).
- **What standards should apply before reconsideration of a spacing determination that was previously approved after notice and hearing?**
 - This is something that needs to be examined on a case-by-case basis. If the holder of the current spacing order has been diligently pursuing

development, has invested time, money and resources into development and it is clear that they are serious about development, then the Board simply should not vacate the order. Doing so would create too much uncertainty on investments that can take years to see to fruition and cost tens of millions of dollars. Absent a showing that the holder of the spacing order did little to nothing during at least a two-year period, and a compelling reason to approve a new development plan (that still promotes orderly development) the burden of vacating an existing spacing unit must be high.

For the standard, the Board needs to look at the totality of the circumstances. The competing applicant should have the burden to demonstrate that the original party has not taken steps to reasonably pursue development of the approved spacing unit; but the Board should certainly look at all facts and circumstance such as what work has been done, commodity prices, outside factors such as federal permitting, weather, etc., whether either party is up against significant lease expirations, and so on, under the framework of its statutory mandates.

3. **Drilling Permit Duration and Renewal** (Drilling permits are valid for six months, with the original operator typically given preference upon renewal).
- **Under what circumstances, if any, should another operator be allowed to compete for the permit location upon renewal?**
 - This should be a high hurdle in nearly every case given the short 6-month permit window under Montana law. If the Board does consider rule making, then we think changing drilling permits from 6-months to 1-year would be something to strongly consider.
 - **When would it be appropriate to allow protest of a permit renewal?**
 - If the holder of the permit owns very little working interest in the spacing unit, yet the Board originally approved the permit, then a third party with a significantly higher working interest should have the opportunity to challenge. Another circumstance may be if the protesting party had significant and legitimate concerns about lease terminations within the spacing unit absent timely drilling.
 - **Should preference to the original operator continue absent materially changed circumstances?**
 - Yes. Under nearly all circumstances, preference to the original operator should continue. Six-months is a short period of time for development and

an operator needs some level of certainty of operations when it is expending time and resources toward development.

As a final note, we've seen an increase in frustration from operators who spend the necessary time on the front end planning out long term development, submitting an application for temporary spacing, preparing exhibits and then attending the hearing to present testimony and obtain a temporary spacing order. Then, after all of the work on the front end, another company immediately files a drilling permit in that temporary spacing unit. The Montana Board has consistently said that establishing spacing does not determine operatorship. In the current environment, however, perhaps the Board considers granting priority of operatorship to the company that has spent the time and effort on the front end to obtain the TSU order either through express language in the Order or Board policy.

We appreciate the opportunity to provide comment. If you have any follow-up questions please let us know.

Sincerely,



Uriah J. Price


John R. Lee



March 25, 2026

Ben Jones, Administrator
Montana Board of Oil and Gas Conservation
2535 St. Johns Avenue
Billings, MT 59102
mtogpub@mt.gov

RE: Written Comments — Request for Public Comment on Temporary Spacing and Permitting (February 24, 2026)

Dear Administrator Jones and Members of the Board,

After careful review and discussion, it is White Rock's opinion that the Board's current rules, regulations, and policy provide the necessary flexibility for the Board to address the various issues we are currently seeing. White Rock does not believe any significant changes are necessary and the current flexibility allows the Board to address the uniqueness of the numerous dockets we are seeing on a case-by-case basis under the umbrella of its statutory mandates.

We commend the Board for soliciting operator input on these procedural matters. The questions raised touch directly on our ability to plan and execute an efficient drilling program, protect our correlative rights as a non-op WI holder, and ensure that Montana's oil and gas resources are developed in an orderly and economically rational manner.

We are available to discuss further, either in writing or in person at the April 8, 2026 Board meeting.

Respectfully submitted,

Chad Centorbi

Chad Centorbi
Land Manager
White Rock Oil & Gas, LLC
5810 Tennyson Pkwy, Ste 500
Plano, TX 75024
214-981-1421, ccentorbi@whiterockog.com

March 25, 2026

Montana Board of Oil and Gas Conservation
Attn: Ben Jones, Administrator
2535 St. Johns Avenue
Billings, MT 59102
mtogpub@mt.gov

Sent via email to mtogpub@mt.gov

RE: Response to Request for Public Comment on Temporary Spacing and Permitting

Mr. Jones,

Phoenix Operating LLC (“**Phoenix**”) submits the following written comments for consideration by the Montana Board of Oil and Gas Conservation (“**Board**”) in response to the Board’s request for public comment on temporary spacing and permitting dated February 24, 2025.

I. Timing Language in TSU Orders

- a. *How do operators interpret the language in temporary spacing unit (“TSU”) orders that commencement of drilling operations shall occur within one year of the date of the order?***

Phoenix interprets the current one-year language as essentially locking in the TSU for that one-year period, meaning that during that period, no other operator may request that the TSU be vacated. Additionally, any operator during that one-year period may apply for an Application for Permit to Drill (“**APD**”) and commence drilling operations within that TSU. Phoenix further understands that this TSU will remain in place after one year in accordance with Mont. Code Ann. § 82-11-201(2), unless the Board issues an order to vacate the same.

- b. *What regulatory purpose does the one-year language serve?***

The one-year language fulfills the regulatory goal of encouraging the timely development and administration of TSUs in accordance with the Board’s statutory obligation to establish TSUs to prevent waste, avoid the drilling of unnecessary wells, and protect correlative rights under Mont. Code Ann. § 82-11-201(1). However, Phoenix believes the language could also provide more certainty with some modifications to the current language. The one-year language should provide other



operators with the certainty that, after the one-year period, they will have the opportunity to apply for a new spacing order if an alternative development plan, without the requirement by the Board that the operator obtain the original applicant's (the "Applicant-Operator") consent. Encouraging orderly and timely development of the minerals is beneficial to both the operators, the Board, and mineral interest owners as it: a) brings certainty to all operators on the language's intent; b) reduces the number of TSU applications presented before the Board, which will reduce overhead and promote efficiency for the Montana Board of Oil and Gas Conservation (the "MBOGC") staff's workload; and c) protects the correlative rights of mineral owners. If an operator does not commence drilling within one year, as ordered by the Board, other operators with alternative development plans should have the opportunity to submit an application for a TSU and vacate the previous order. In doing so, the Board will consider the subsequent application, and preference will not be given to the Applicant-Operator who either was not first to file for the APD or failed to commence drilling operations within the required one-year time period or the operator who obtained the initial APD.

c. Should the Board continue including the one-year language in TSU orders, modify the language, or eliminate the language? If retained, how should the effect of the language be defined?

Yes, Phoenix respectfully requests that the Board continue to include the one-year language in TSU orders. However, Phoenix would propose modifying the language to clarify that if drilling has not commenced within one year, then the applicable lands may be re-spaced by a different operator under a new TSU application and resulting Board order. This additional language, provided below, will clarify for operators the effect of the one-year language.

Proposed Language:

An operator shall commence the drilling of such well, subject to this Order, within one year from the date of this Order. In the event that drilling operations are not commenced within such one-year period, the TSU and applicable lands affected hereby shall become eligible for an operator to submit an application to vacate the TSU.

II. Duration and Finality of TSU Orders

a. How long should a TSU order remain in effect before the Board entertains a petition to vacate it in favor of an alternative development proposal?

Phoenix proposes that a TSU order remain in effect for one year before the Board may consider a petition to vacate it in favor of an alternative development proposal. This procedural practice would promote efficient drilling activities by the operators while still providing a mechanism for other operators to petition the Board to reconsider alternative spacing configurations, which may promote more efficient and economic overall drilling activities should an operator not commence drilling within one year as ordered by the Board. As discussed above, this practice is consistent with the Board's

statutory obligations to establish TSUs to prevent waste, avoid drilling unnecessary wells, and protect correlative rights under Mont. Code Ann. § 82-11-201.

However, there needs to be mechanisms in place to prevent operators from using approved APDs and renewals thereof to lock up development of the TSU should an operator not commence drilling within the one-year period. Phoenix believes there are various options to prevent one operator from effectively blocking another operator's development of a TSU. One option would be to have the APD's validity last for no more than one year in conjunction with the TSU, rather than a separate six-month period. Therefore, if the APD was not submitted simultaneously with the TSU but rather one month before the one-year term expired, the APD would be valid only for the remaining month. The other option is to allow another operator to protest the APD's renewal, as outlined further below.

b. Should the passage of time or non-development constitute ground for reconsideration?

Phoenix reiterates its earlier proposal that the passage of time and the lack of development should constitute grounds for reconsideration. In addition to the foregoing reasons, allowing for a TSU to remain in effect for at least one year and, if no drilling is commenced, allowing operators to propose alternative spacing considerations, would increase regulatory certainty for the operators regarding the TSU's status and enforceability, encourage development, promote orderly development, and protect the correlative rights of affected owners.

c. What standards should apply before reconsideration of a spacing determination that was previously approved after notice and hearing?

Phoenix proposes that, after the one-year period expires, the only standard the Board shall apply to its reconsideration is whether the Applicant-Operator or the operator who was first to file and received APD approval commenced drilling operations as required by the Board order. This standard would not require the Board to choose between competing economic or operational development strategies, but it would instead provide an opportunity for other operators to propose development plans that better protect correlative rights and reduce waste than the existing TSU, and who are prepared to develop the spacing unit within the allotted time period.

III. Drilling Permit Duration and Renewal

a. Under what circumstances, if any, should another operator be allowed to compete for the permit location upon renewal?

As matters currently stand, the failure to commence drilling does not affect an operator's ability to file for an APD renewal, and that operator is favored by the Board for the renewal of the APD. As a result, operators continue to file for APD renewals, which extend the APD in six-month increments, but they never actually commence drilling. This practice, if drilling operations are not commenced, essentially locks up minerals well beyond the initial six months contemplated by the APD and the

requirement that drilling be commenced within one year of TSU approval. This practice is in direct conflict with the Board's statutory duty to protect correlative rights of affected owners, as development may freeze for much longer than six months or one year, despite the explicit language in the APD and underlying TSU Order. To counteract this cycle, which essentially locks up development by an operator with no near-future plans to develop the minerals, another operator should have the opportunity to protest APD renewals if the operator who first received APD approval fails to commence drilling during the initial APD period and then seeks to obtain an APD renewal. Upon expiration of the first APD period, whether it remains for six months or is extended, a competing operator should be given preference if the operator holding the APD failed to comply with A.R.M. § 36.22.604(3) and to commence drilling operations within the Board-ordered one-year time period. This preference is in furtherance of the Board's objectives to provide regulatory certainty and promote orderly development, as the preference is consistent with the current regulatory framework under A.R.M. § 36.22.604 and will strengthen that framework by providing clarity among other operators regarding drilling opportunities in existing TSUs.

Phoenix also notes the overarching issue that the six-month APD authorization is inconsistent with the requirement by the Board to commence drilling within one year of an Order. Phoenix proposes that the Board consider new rulemaking or an amendment to A.R.M. § 36.22.604 to address this inconsistency by creating a timing mechanism that aligns the APD period with the expiration of the one-year TSU period.

b. When would it be appropriate to allow a protest of a permit renewal?

Phoenix proposes that competing operators should have the opportunity to protest an APD renewal if the current APD operator has failed to take action to comply with A.R.M. § 36.22.604(3) and to commence drilling operations. This protest mechanism promotes a more sincere APD process by incentivizing operators to commence drilling efficiently and strategically. The ability to protest will encourage the timely development of the land and will prevent the operators from locking up minerals for an extended period, thereby ultimately protecting the correlative rights of affected owners. The protest mechanism may also reduce the overall number of APDs presented to the MBOGC staff and the Board, as it will de-incentivize applicants from seeking APDs without immediate plans to drill, if the operator is aware that other operators may protest renewal applications should they fail to commence drilling in a timely fashion.

c. Should preference to the original operator continue absent materially changed circumstances?

As discussed above, Phoenix proposes that the protesting party be given preference over the operator who holds the current APD if that operator has failed to commence drilling operations in accordance with the TSU and APD as proposed herein. The ability for a competing operator to step in should that operator fail to commence drilling encourages strategic and efficient development in the land, prevents waste, and promotes the protection of correlative rights because operators must be ready to actively pursue development, and not just lock minerals up for extended periods of time

without further development or drilling activities. The preference to the new operator is in furtherance of the Board's objectives to provide regulatory certainty and promote orderly development, as such preference is consistent with the current regulatory framework under A.R.M. § 36.22.604 and will strengthen that framework by providing clarity among other operators regarding drilling opportunities in existing TSUs.

IV. Proposal for Protestation of Temporary Spacing Unit Applications.

- a. Phoenix recognizes that the Board did not request comments on the TSU application process; however, Phoenix believes it would be remiss not to address this subject in light of the Board's other public comment requests.

Phoenix proposes that the Board consider engaging in rulemaking to establish a procedural TSU protest mechanism, under which a protested TSU application is automatically continued for one hearing cycle to allow the protesting party an opportunity to present a valid, competing TSU on the same docket for the Board's simultaneous consideration. For the interim, any protest of a TSU would stay the Board's consideration of the application for one hearing cycle, until the competing operator has an opportunity to submit an application with their alternative development plan. The procedural mechanism created thereunder furthers the Board's statutory obligations under Mont. Code Ann. § 82-11-201(1) by providing a procedure through which the Board can more comprehensively consider spacing configurations that best address those obligations.

By allowing a protesting operator a hearing cycle to prepare and submit a competing TSU application, the Board ensures that affected mineral owners and operators have an opportunity to be heard and to propose development of the land that protects correlative rights, prevents waste, and avoids unnecessary drilling, by reducing the risk of suboptimal spacing outcomes. Competing proposals help ensure that the Board selects the TSU application that supports its statutory obligations to affected owners, rather than one driven by procedural timing.

The protest mechanism also reduces duplicative proceedings and allows the Board to resolve spacing disputes in a single consolidated proceeding, thereby conserving administrative resources and providing greater regulatory certainty.

Thank you for the opportunity to provide the foregoing comments and your consideration thereof. Please direct any questions to Kelley Lewis at klh@klhadvisors.com.

Sincerely,

Kelley Lewis

Kelley Lewis
KLH Advisors PLLC



Kraken Oil & Gas LLC

945 Bunker Hill Road, Suite 1200, Houston, TX 77024

Date: March 25, 2026

To: Montana Board of Oil & Gas Conservation

From: Kraken Oil & Gas LLC

RE: Request for Public Comment on Temporary Spacing and Permitting

Kraken Oil & Gas LLC (“**Kraken**”) appreciates the opportunity to respond to the Montana Board of Oil and Gas Conservation’s Request for Public Comment on Temporary Spacing and Permitting in the State of Montana.

As the most active operator in development of the Bakken play in Richland and Roosevelt Counties over the past decade, we have seen a lot of changes in oil and gas development in the State of Montana. Kraken was founded in 2012 and we drilled our first wells in Montana in 2013. Since 2015, Kraken has drilled over 150 of the 200 Bakken wells drilled in Montana. Our belief is that up until very recently, Kraken and other operators have been able to work with land owners, other operators and local/state/federal agencies in a collaborative manner to find win-win solutions that advanced development within much the same regulatory framework that has worked so well in Montana for over 50 years. This was all accomplished while preventing waste, protecting correlative rights, promoting orderly and efficient development, avoiding unnecessary wells and protecting the environment.

Please find below are thoughts on the issues the Montana Board of Oil and Gas Conservation have requested input on.

- (1) Kraken interprets the language requiring commencement of drilling operations within one year of the date of the order as a one-year clock on the setback footage set forth in the applicable order. If drilling operations were not commenced within the year, the TSU would remain valid but the setbacks for such TSU would revert to the statewide spacing/setbacks. We believe this has always been the intent of the Board and up until recently that has been the interpretation of operators in Montana. Given the motus operandi of some current operators in Montana, it may make sense for the Board to more explicitly link such language to the setback footages set forth in the applicable order, even though it has been the longstanding interpretation in Montana that this language only related to the setback footage.
- (2) With respect to the duration and finality of TSU orders we feel that a TSU should be indefinite. Provided, however, that if after three (3) years, if for certain specified reasons, including, but not limited to, geological or technical evidence which demonstrates a change in development is warranted, the Board could entertain a petition to vacate the existing TSU in favor of an alternative development proposal. In addition, there could be certain circumstances where the original applicant for the TSU (i) supports an alternative development proposal or (ii) is no longer in business, either of which could support a petition to vacate the existing TSU in favor of an alternative development proposal. With respect to a TSU we do

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not believe that solely the passage of time or non-development should constitute grounds for reconsideration.

Kraken also believes that if there are competing permits to drill submitted for a particular TSU, preference should be given to the operator who was the applicant for such TSU.

- (3) Drilling Permits should be valid for a minimum of two (2) years. Preference should be given to the original named operator on a protest or a renewal provided, that, such operator can demonstrate that they have been progressing development in a timely and diligent manner, have expended meaningful capital on long lead items, are waiting on approvals outside of their control such as a BIA/BLM permit and/or approvals, or have a majority working interest in the DSU either through outright ownership or with the support of other working interest owners. As in other oil and gas producing states, during a protest for a permit renewal the Board must examine and weigh the totality of the circumstances, including, but not limited to, the factors set forth above. An additional factor that we have also seen discussed in other states is near term expiry of leasehold (which was taken before the original drilling permit was granted), which we believe should be a factor, but not controlling. We believe that preference to the original operator should continue absent materially changed circumstances. We also believe that in an application for a permit to drill, preference should be given to an applicant who has a supermajority (at least 80%) of the ownership in the TSU if they have demonstrated a plan to develop the resources in a timely manner.

In addition, Kraken strongly believes that in an initial application for a drilling permit, if the surface location for the proposed well is off unit, it should be a requirement that the applicant for the permit must have first obtained a surface use agreement from the landowner covering the proposed surface location, which should be included (or an affidavit from the applicable surface owner) with the application. Otherwise, the applicant is only applying for a protection permit which they have no means of actually drilling which runs contrary to the statutory mandates of the State of Montana. This is a requirement in other states with active oil and gas development, including North Dakota.

We appreciate the opportunity to provide comments to the Board on your Request for Public Comment on Temporary Spacing and Permitting in the state of Montana and hope you will consider implementing all of these recommendations to ensure the prevention of waste, protection of correlative rights, protection of the environment and orderly oil and gas development in Montana Bakken for many years to come.

Sincerely,



Bruce Larsen
President & CEO
Kraken Oil & Gas LLC



March 25, 2026

Via Email: mtogpub@mt.gov

Ben Jones, Administrator
Montana Board of Oil and Gas Conservation
2535 St. Johns Avenue
Billings, Montana 59102

Re: Written Comments of Continental Resources, Inc. in Response to the Board's February 24, 2026 Request for Public Comment on Temporary Spacing and Permitting

Dear Administrator Jones:

Continental Resources, Inc. ("Continental") respectfully submits these written comments in response to the Montana Board of Oil and Gas Conservation's (the "Board") February 24, 2026 Request for Public Comment on Temporary Spacing and Permitting. Continental welcomes this review and is grateful for the opportunity to contribute.

Continental is one of the largest operators in Montana's Bakken and Three Forks play, with active development interests across multiple spacing units, formations, and unit configurations throughout the Williston Basin on both sides of the Montana–North Dakota state line. Continental also operates under the regulatory frameworks of North Dakota, Oklahoma, Wyoming, and Texas. That operational breadth gives Continental direct experience with how permit timing, spacing finality, and development sequencing affect capital allocation, surface coordination, midstream infrastructure, and ultimately mineral owner outcomes.

Continental approaches these comments not as a critique of the Board's existing regulatory framework, but as an expression of confidence in it. As discussed below, Continental has conducted a comprehensive review of Board orders from February 2011 through the Board's most recent session in February 2026. A non-exhaustive list of Board orders illustrating these principles, organized by issue and relevance, is attached as Exhibit B. That review—spanning more than fifteen years and hundreds of contested and uncontested proceedings—reveals a regulatory record that is remarkable in its consistency and coherence. The Board has applied a principled, stable framework for temporary spacing and permitting across widely varying market conditions, development cycles, and competitive circumstances. Continental's recommendations are designed to codify and clarify that framework, not to change it.

Continental's comments track the three issues the Board identified and include brief observations on additional matters that bear on the effectiveness of the current framework. A comparative summary of peer-state regulatory practices is attached as Exhibit A. The February 2026 public comment letter of Montana Trust Lands to the Board is attached as Exhibit C.

I. TIMING LANGUAGE IN TSU ORDERS

A. The Board Has Consistently Treated the One-Year Condition as Attaching to the Setback Authorization, Not the TSU Itself

The one-year timing language present in TSU orders—requiring that 'operations for the drilling of said well be commenced within one year of the date of this order'—has appeared in Board orders since at least December 2011 and applies to the 500' lateral setback authorization, not to the temporary spacing unit. (See, e.g., Board Order Nos. 406-2011, 409-2011, 204-2014, and 205-2014, summarized in Exhibit B.) Continental's review of the Board's orders confirms that this interpretation is the one consistently applied.

The record of Board orders from 2011 through 2013 is particularly instructive on this point. Across dozens of orders involving Bakken and Three Forks spacing in the townships at issue in this proceeding, the Board conditioned reduced setback approvals with language in at least four distinct formulations, each of which targeted the setback authorization specifically:

- "the 500' lateral setback amendment to Board Order [X] is only valid for one year from the date of this order"
- "the 500' lateral setback authorized in the paragraph above is only valid for one year from the date of this order, after which time the lateral setback will be 1320'"
- "authorization to drill the second well with a 500' lateral setback is only valid for one year from the date of this order"
- "the authorization to drill [a well] with a 500' lateral setback is only valid for one year"

The second formulation is especially significant. It expressly identifies the consequence of expiration as a reversion of the setback to 1320'—not a dissolution of the spacing unit. If the Board had understood the TSU to dissolve upon expiration, there would be no setback to revert to. The unit persists; only the reduced setback lapsed. This drafting choice reflects a coherent regulatory design, not an inadvertent omission.

As the Board's standard order language evolved in approximately 2014, these formulations were streamlined without changing their substance. Board Administrator Jim Halvorson confirmed this reading at the June 2014 business meeting preceding the hearing for Board Order Nos. 204-2014 and 205-2014, where he explained that the one-year time limit was designed to condition the Board's acceptance of a 500' setback—and that the setback, not the unit, is what reverts if drilling does not commence within that period. The actual order language issued at that hearing followed the familiar drilling-authorization formulation. Nothing in the 2014 orders or the staff explanation surrounding them suggests that the Board intended to silently alter the structural relationship between the setback condition and the spacing unit.¹

Continental has not identified any order in the complete record—across fifteen years and hundreds of proceedings—in which the Board has held that a TSU expired by its own terms. That

¹ Board Order Nos. 204-2014 and 205-2014 (Jun. 19, 2014). Staff (Administrator Halvorson) stated at the business meeting preceding the hearing that the one-year condition attaches to the 500' setback authorization and that the consequence of non-drilling is reversion of the setback to 1320'—not dissolution of the TSU. The orders themselves follow the familiar drilling-authorization formulation.

unbroken practice is not accidental. It reflects the Board's consistent understanding of what the timing language was designed to accomplish.

B. The Board's Post-2014 Practice Confirms the Same Framework

The Board's treatment of TSUs in contested proceedings since 2014 confirms that the one-year commencement condition does not operate as a self-executing expiration trigger on the unit. In a series of heavily contested proceedings between 2025 and 2026 involving competing operator applications in Roosevelt and Richland Counties, the Board repeatedly affirmed that established TSUs remain in effect regardless of whether the one-year period has run, as long as no competing application has been granted and the original applicant has not vacated the unit.

Most explicitly, in Board Order Nos. 309-2025 through 313-2025, the Board stated in the Findings of Fact common to all five related dockets:²

"The Board discussed its historical practice of allowing operators a reasonable opportunity, generally one year, to commence operations within a temporary spacing unit, even where that condition is not expressly stated in the order. The Board further discussed concerns that vacating temporary spacing units with active drilling permits at the request of third parties could undermine procedural stability and invite repeated challenges to existing orders."

This is the Board's own characterization of its own practice—and it confirms two things. First, the one-year period is the Board's customary expectation, not a self-executing expiration. Second, the Board views stability of established spacing units as a substantive conservation value, not merely a procedural preference. These are exactly the principles that Continental asks the Board to codify in this proceeding.

C. Regulatory Purpose the Language Serves—and Where Clarification Would Help

Continental understands the one-year timing condition to reflect a legitimate Board interest: ensuring that operators who receive a 500' setback benefit—which permits well placement closer to unit boundaries than the Board's default standard—intend to develop within a reasonable horizon and do not simply hold that setback advantage indefinitely without activity. That is a reasonable regulatory objective, and Continental does not challenge it.

The problem is that the current drafting conflates the setback condition with the unit itself, generating interpretive disputes and tactical opportunities for third parties that the Board's framework was never designed to create. When an operator who chose not to attend the original hearing can later challenge an established spacing unit simply by asserting that the one-year period has passed, the Board's notice-and-hearing process is undermined rather than reinforced.

The fix is straightforward and consistent with how the Board has historically operated: separate the timing condition from the unit, state its scope and consequence with precision, and codify what the record already shows the Board has always understood.

² Board Order Nos. 309-2025 through 313-2025, Docket Nos. 374-2025, 375-2025, 384-2025, 385-2025, and 386-2025 (Dec. 11, 2025). The quoted language appears in Finding of Fact No. 12, which is identical across all five orders. Dockets were consolidated for hearing and continued to the February 12, 2026 public hearing.

D. Continental's Recommended Approach

Continental recommends the Board adopt the following clarifications, each of which is consistent with the Board's existing practice:

- **Confirm that TSUs do not expire by their own terms.** A TSU established after notice and hearing, including one approved with a 500' lateral setback, does not dissolve upon expiration of the one-year timing condition. The unit remains in effect until vacated by the original applicant, modified upon a demonstrated material change in circumstances, or dissolved by Board order following a full hearing.
- **Limit the one-year condition expressly to the setback authorization.** If an operator has not commenced operations within one year and seeks to retain the 500' setback benefit, the Board may require a renewed showing at that time. But the TSU itself—the spacing determination—is not affected.
- **Extend the setback authorization window to two years going forward.** When the Board expressly conditions a 500' setback authorization on timely commencement of operations, that condition should run for two years rather than one. A two-year window better reflects the realities of modern horizontal pad development—including geological modeling, lease aggregation, surface agreement execution, midstream coordination, capital budget approval, and rig scheduling—and is consistent with the effective permit windows provided by every peer state in Continental's operational footprint. This recommendation is forward-looking: it speaks to how the Board should draft the express setback condition going forward, and does not alter the analysis of what existing order language means or how the Board has historically applied it.

These recommendations ask the Board to do exactly what its record supports: state clearly what has always been true.

II. DURATION AND FINALITY OF TSU ORDERS

A. The Board's Record Reflects a Consistent Policy of TSU Durability

Continental's review of the Board's orders from February 2011 through February 2026 shows a consistent practice: the Board has not vacated or reconfigured an established temporary spacing unit based solely on the passage of time or a competing operator's development proposal, absent the consent of the original applicant or a demonstrated material change in circumstances. That practice is illustrated by the age of the orders the Board has been asked to act upon. Across the review period, the Board processed uncontested vacatur of orders ranging from Board Order No. 30-1967 (vacated in August 2023, approximately 56 years after issuance) to Board Order No. 71-1997 (vacated in October 2023, approximately 26 years after issuance) to Board Order No. 394-2004 (vacated in June 2013, approximately nine years after issuance), and in every case, the Board acted on the original applicant's motion. By contrast, in proceedings where competing operators challenged established spacing on the grounds of alleged non-development, acreage "lock-up," or procedural unfairness—including the contested proceedings of 2025 through 2026—the Board consistently declined to disturb the existing TSUs on those grounds alone.³ (See, e.g.,

³ Board Order No. 30-1967 (vacated Aug. 2023, applicant-initiated, no protest); Board Order No. 71-1997 (vacated Oct. 2023, applicant-initiated, no protest); Board Order No. 394-2004 (vacated Jun. 2013, Continental Resources, applicant-initiated, no protest). Continental's review identified numerous additional applicant-initiated vacatur of orders ranging from 1 to 22+ years in age; in no instance did a competing operator successfully challenge an established TSU on durability grounds.

Board Order Nos. 30-1967, 71-1997, 394-2004, 228-2025 through 231-2025, and 309-2025 through 313-2025, summarized in Exhibit B.)

The Board's most direct articulation of this principle came in a series of contested proceedings between 2025 and 2026, in which a competing operator presented comprehensive challenges to established TSUs on grounds of alleged non-development, acreage lock-up, and procedural unfairness. The Board's response was consistent across every contested docket.

In Board Order Nos. 228-2025 through 231-2025, for example, after the competing operator argued that extending an existing TSU's commencement period would "lock up undeveloped acreage," "limit the opportunity for other qualified operators to present alternative development plans," and constitute "speculative control of acreage without active drilling," the Board found:⁴

"The Board considered Phoenix's protest and found that Kraken's application complied with the statutory requirements of § 82-11-201 MCA. The Board noted that Phoenix had no pending application before it, that Kraken agreed to amend its request to conform to the Board's standard one-year commencement requirement, and that Phoenix's due-process concerns relate to agency procedural matters outside the scope of this docket. The Board determined that Kraken's proposed revision, as amended, would promote efficient development, minimize surface disturbance, and protect correlative rights consistent with prior Board decisions."

The Board rejected the same arguments in August 2025, in consolidated proceedings involving six separate contested dockets. It rejected them again in December 2025 and in February 2026. Continental is not aware of any Board proceeding within its review period—covering February 2011 through February 2026—in which these arguments—passage of time, competing proposal, acreage hold—have succeeded as independent grounds to disturb an established TSU.

B. Why Durability Serves the Board's Statutory Mandate

Temporary spacing units are a creature of the 1993 Montana Legislature, which amended the Oil and Gas Conservation Act's spacing statute to replace the prior 'drilling unit' framework. The legislature's stated purposes were twofold: to allow all owners within the unit to share in production from the date of first runs — rather than only the drillsite owner through the rule of capture — and to provide a mechanism for risk-refusal penalties on wildcat wells. The TSU was designed as a correlative-rights protection tool. It was not designed as a development-pace mandate, and nothing in the 1993 amendment or its successors conditions unit stability on the speed at which the operator proceeds to drill.⁵ Indeed, the statute itself forecloses the argument that a TSU expires by its own terms: a temporary spacing unit must remain in effect until superseded by an order issued by the board or until a permanent spacing unit is established.' § 82-11-201(2), MCA.

The Board's consistent approach reflects a sound understanding of what TSU stability is for. A temporary spacing unit is the product of a formal regulatory proceeding—published notice,

⁴ Board Order Nos. 228-2025 through 231-2025, Docket Nos. 302-2025 through 305-2025 (Oct. 9, 2025). Dockets consolidated for hearing. The quoted language appears in Finding of Fact No. 10, which is identical across all four orders.

⁵ Kemp J. Wilson, *Montana Board of Oil and Gas Conservation — Waste Prevention in the Big Sky Country, in Onshore Pooling and Unitization*, Rocky Mountain Mineral Law Foundation Special Institute, Ch. 5G, at 5G-3 to 5G-4 (1997).

opportunity for all affected parties to appear, presentation of geological and engineering evidence, and a Board decision on the merits. That process has value only if its outputs are durable. An operator who invests in that process—and in the capital planning that follows it—is entitled to rely on the resulting spacing determination.

The Board has recognized this principle explicitly. In Board Order Nos. 309-2025 through 313-2025, the Board noted that vacating TSUs with active drilling permits at the request of third parties "could undermine procedural stability and invite repeated challenges to existing orders." That concern is well-founded. If established spacing units can be reopened whenever a competitor files a competing application and asserts that the original applicant has not drilled quickly enough, the Board's hearing process becomes a starting gun rather than a resolution and confirmation of orderly development. Operators would face continuous exposure to challenges regardless of whether they had obtained a valid order through proper process. That is not orderly development—it is regulatory instability.⁶

The Board's mandate to prevent waste and protect correlative rights also supports durability. As the Board found in Board Order Nos. 82-2026 and 83-2026:⁷

"The statutes do not require that reserves within a spacing unit be recovered at a particular rate, and leasehold timing considerations arise from private contractual arrangements between mineral owners and lessees."

The rate at which an operator develops a spacing unit is primarily a function of market conditions, capital allocation, infrastructure availability, and operational sequencing—not regulatory reconfiguration. Forcing an operator to re-litigate its spacing order every time a competitor wants to move faster does not accelerate development; it disrupts it.

The Board's waste prevention mandate extends beyond the prevention of physical waste at the wellbore. It encompasses inefficient recovery from a shared reservoir. An operator whose development practices result in materially lower hydrocarbon recovery — whether through suboptimal completion design, inadequate infrastructure, or insufficient operational capability — implicates § 82-11-201, MCA directly. Where competing development proposals for the same reservoir would produce materially different recovery outcomes, that difference is relevant to the Board's statutory analysis. A framework that ignores recovery efficiency in favor of administrative sequence alone does not fully discharge the Board's mandate.

C. Non-Development Alone Is Not a Sufficient Basis for Reconsideration

Non-development alone should not constitute grounds for reconsideration of an established TSU. This position reflects both the Board's existing practice and sound policy. In the Bakken and Three Forks development, the timing of drilling within a TSU is driven primarily by market conditions, capital allocation, infrastructure timing, and surface coordination—not by a lack of development intent. Allowing a third party to leverage ordinary development sequencing as a basis to vacate an established spacing order would invite tactical interference and impose real costs on operators, mineral owners, and the regulatory system without advancing conservation.

⁶ Board Order Nos. 309-2025 through 313-2025, Docket Nos. 374-2025, 375-2025, 384-2025, 385-2025, and 386-2025 (Dec. 11, 2025). Finding of Fact No. 12, common to all five orders.

⁷ Board Order Nos. 82-2026 and 83-2026, Docket Nos. 2-2026 and 8-2026 (Feb. 13, 2026). Finding of Fact No. 8, common to both orders. Identical language appears in Board Order Nos. 86-2026, 87-2026, 91-2026, and 92-2026 from the same session.

The Board should formalize the principle its record already reflects: TSUs remain in effect absent (1) a demonstrated material change in circumstances, such as a significant change in reservoir characterization, a change in the applicable regulatory framework, or a showing that the approved unit geometry is affirmatively inconsistent with orderly pool development; or (2) the consent of the original applicant. Passage of time and non-development, standing alone, do not satisfy either standard.

D. Standards for Reconsideration Where Material Changed Circumstances Are Alleged

Where a party does allege material changed circumstances, Continental recommends a burden structure that reflects the Board's existing practice and protects the integrity of the original hearing:

- **The petitioner bears the burden of demonstrating material changed circumstances.** A competing development proposal, standing alone, is not sufficient. The petitioner must present specific geological, engineering, or economic evidence that conditions have changed in a way that makes the approved unit geometry inconsistent with orderly development.
- **The petitioner must demonstrate sufficient working interest and development capability.** Any party seeking to displace or reconfigure an established spacing unit should hold a working interest of sufficient size and character to support actual development, not a nominal or minority interest acquired for tactical purposes. The Board should not entertain petitions from parties that cannot demonstrate both legal authority and practical capability to drill.
- **The original applicant's development record and plans should be considered.** Before reconfiguring an established unit, the Board should weigh whether the original applicant has taken meaningful steps toward development—such as capital commitments, surface use agreements, infrastructure coordination, permit maintenance, or other tangible planning efforts.

Across the peer states where Continental operates, regulators apply some form of capability and diligence threshold in deciding who may develop within a spacing unit. Wyoming's Rule 8(m) is one example of that approach, but the underlying principle is broader than any single state framework. A similar standard in Montana would provide a meaningful check on genuine non-development while protecting the timely, orderly development of Montana's oil and gas resources.

E. Standards for Modification and Extension of Established TSUs — and the Independence of the Underlying Unit

The Board's record reflects a consistent practice of granting commencement deadline extensions and well density modifications at the request of established TSU operators. That practice is sound, and Continental recommends the Board formalize it with a clear standard that serves two purposes: defining what the original operator must show to obtain a modification, and confirming that the outcome of a modification proceeding — whether the request is granted or denied — has no bearing on the validity or durability of the underlying spacing unit.

The modification standard. When an original TSU applicant seeks to extend a commencement deadline, authorize additional wells, or otherwise modify an existing TSU, the

Board should grant the request upon a showing that: (a) the applicant holds a working interest of sufficient size and character to support actual development; (b) the applicant has taken meaningful steps toward development — such as capital commitments, surface use agreements, infrastructure coordination, or permit maintenance — demonstrating genuine development intent; and (c) no material changed circumstances have occurred that would make the original unit geometry inconsistent with orderly pool development. Where those conditions are met, the Board should grant the modification. The standard is not onerous — it asks for good faith and documented progress, not completion. Most modification requests in the Board’s record have been uncontested and appropriately resolved on that basis.

Where the modification is contested, the burden should remain on the party seeking to deny or limit the modification, not on the original applicant. The original applicant’s prior approval through a full notice-and-hearing process is entitled to deference. A competing operator’s mere preference for a different development timeline is not a sufficient basis to deny a modification that otherwise satisfies the standard above. As the Board found in Board Order Nos. 213-2025 through 221-2025, commencement extensions sought in good faith by established operators should be granted even over third-party protest, where the applicant has agreed to conform to the Board’s standard one-year commencement condition.

The independence of the underlying unit. The most important principle in this context is one the Board’s existing practice implies but has never stated explicitly: the outcome of a modification proceeding does not affect the validity of the underlying TSU.

If the Board denies an extension request — because the applicant has not demonstrated sufficient development progress, or because the specific modification is not warranted — that denial speaks to the relief requested. It is not a finding that the TSU was improperly granted, that it has expired, or that a competing operator may now seek to reconfigure it. The TSU established through the original notice-and-hearing process remains in effect on its original terms. The consequence of a denied extension is that the commencement deadline is not extended — not that the unit dissolves.

This distinction matters because without it, a modification proceeding becomes a vehicle for collateral attack on the underlying unit. A competing operator could appear at a modification hearing, argue against the extension, prevail on that narrow question, and then use the denial as evidence of non-development sufficient to justify vacating or reconfiguring the TSU itself. That is not and should not be the standard. The Board should make explicit that: (1) modification proceedings are limited in scope to the specific relief requested; (2) denial of a modification does not constitute a finding that the original TSU is invalid or subject to reconsideration; and (3) any challenge to the underlying unit must be brought as a separate proceeding under the material-changed-circumstances standard described in Section II.C of these comments, with the burden on the petitioner.

Continental recommends the Board codify this principle alongside the other durability standards recommended above. Together, they would close the loop on the tactical use of the modification process — ensuring that operators can seek extensions and modifications in good faith without inadvertently creating a procedural opening for competitors to challenge their foundational spacing rights.

The distinction between development authority and unit architecture. A related principle warrants explicit statement. The Board’s two-stage regulatory process—TSU establishment followed by permitting and production—involves distinct forms of authority. At Stage 1, the original TSU applicant’s proposal defines the unit’s geographic and geological framework. At Stage 2, the holder of an active drilling permit exercises development authority within that established framework. These are not the same thing, and the transition from one to the other does not carry with it a change in who may petition to alter the unit’s geometry.

Where a permit is issued to a party other than the original TSU applicant—whether because that party filed the first fully approvable permit or because the Board otherwise resolved a contested proceeding in that party’s favor—the permit holder steps into development authority within the established unit. The permit holder may drill, complete, and produce within the unit’s boundaries on the terms the Board has approved. What the permit holder does not acquire is standing to petition the Board to reconfigure the unit geometry that the original applicant established. Reconfiguration requires either the consent of the original applicant or an independent showing of material changed circumstances under the standard set forth in Section II.C. An agreement between a permit holder and a third party to reconfigure an established unit does not satisfy either requirement; it is a petition subject to the full burden of that standard, with the original applicant retaining full standing to appear and oppose.

F. Standards for TSU Expansion — Adding New Acreage to an Established Unit

A related but distinct question arises when an established TSU operator seeks to expand the unit’s geographic footprint — adding acreage that was not included in the original order. This situation differs from a commencement deadline extension or additional well authorization within existing boundaries: the operator is seeking to change the unit’s geometry, not merely to act within it. The Board’s existing framework addresses some aspects of this question but leaves the standards for expansion requests underspecified. Continental recommends the Board adopt a clear framework organized around the status of the acreage being added.

Scenario A: The expansion acreage is unspaced. Where the acreage an operator seeks to add to an existing TSU has no current spacing order and no pending competing application, the Board should treat the expansion as functionally equivalent to a new TSU application for the additional acreage, evaluated in light of the existing unit’s development posture. The standard should favor the expansion where: (a) the existing TSU operator holds a working interest of sufficient size and character in the expansion acreage to support development; (b) the expansion is geologically and operationally consistent with the existing unit — meaning the added acreage participates in the same formation and would be developed as part of the same coordinated plan; and (c) granting the expansion would promote orderly development and prevent the fragmentation of related acreage into disconnected units that inhibit efficient operations.

The Board’s record supports a permissive approach to this scenario. In Board Order 26-2021, the Board went further than a simple deadline extension, removing the expiration date from an existing TSU entirely on the grounds that the unit “is appropriate and prevents tracts from being excluded from development.” That reasoning applies with equal force to expansion requests that bring adjacent unspaced acreage into an established and active development program. Excluding geologically contiguous acreage from a coordinated development plan

produces exactly the kind of fragmented, inefficient development the Board's spacing authority is designed to prevent.

Scenario B: The expansion acreage is already subject to a spacing order. Where the acreage sought for expansion is already within an established spacing unit — whether permanent or temporary — the Board should evaluate the expansion request under a totality of the circumstances standard, asking whether granting the expansion would serve the Board's statutory objectives of preventing waste, protecting correlative rights, and promoting orderly development. No single factor is dispositive, but the Board should weigh the following:

The expanding operator's working interest in the expansion acreage. Majority ownership is not required, but the operator must hold a working interest of sufficient size and character to demonstrate a genuine economic stake and practical ability to develop the acreage as part of the expanded unit. A nominal or purely tactical interest acquired for the purpose of filing an application, without corresponding development capability, should not be sufficient.

The relationship between the expansion acreage and the existing unit. The expansion is most compelling where the additional acreage participates in the same formation, is geologically continuous with the existing unit, and would be developed through the same coordinated operational plan. Fragmented or opportunistic additions that serve no coherent development purpose weigh against approval.

The effect on existing interest owners in the expansion acreage. The Board should consider whether the expansion would disrupt the reasonable expectations of current operators and interest owners in the affected spacing unit. Where the existing operator objects, that objection should be given weight — but it is not automatically dispositive if the Board finds the expansion necessary to prevent waste or protect correlative rights that would otherwise go unserved. The Board's mandate to protect correlative rights runs to all interest owners, including those in the expanding unit who would benefit from coordinated development.

Whether denial would result in waste or leave correlative rights unprotected. Where the practical consequence of denying an expansion is that acreage producing from the same reservoir remains uncoordinated, subject to drainage, or otherwise excluded from orderly development, that consequence weighs in favor of approval regardless of ownership percentages.

The consent of the existing spacing unit operator. Consent remains relevant and should be actively sought before filing. Where it is obtained, the expansion should be evaluated under the more permissive Scenario A standard. Where it is absent, the Board should proceed to the full totality analysis rather than treating the absence of consent as dispositive.

The Board's articulation in Board Order Nos. 47-2021 and 48-2021 that an overlapping TSU without operator consent "can negatively impact the interests of those owners" correctly identifies one relevant consideration — it is not a categorical bar. On the facts of those cases, denial was appropriate: the applicant held 0.29% working interest, had no development relationship to the existing units, and presented no showing that expansion served orderly

development.⁸ Under a totality standard, that result would be the same. But where an established operator with meaningful working interest seeks to incorporate adjacent acreage into a coordinated development plan, and can demonstrate that the expansion prevents waste and protects correlative rights that the existing spacing framework leaves unaddressed, the Board has both the authority and the obligation to consider it on the merits.

Scenario C: The expansion acreage is subject to a competing pending application.

The most complex situation arises when the acreage an established TSU operator seeks to add is already the subject of a competing application — whether a competing TSU application, a competing well density request, or a competing permit to drill. In this circumstance, the expansion request and the competing application effectively present the Board with a choice between two development proposals for the same acreage, and the Board’s resolution should be governed by principles consistent with the first-fully-approvable-permit doctrine and the Board’s broader approach to competing applications.

The Board’s record provides meaningful guidance. In Board Order 49-2021, the Board resolved competing permit applications from two operators for the same spacing unit by evaluating which application was most consistent with its prior orders — approving Prima’s two-well proposal as consistent with Board Order No. 11-2020 and denying Bison’s competing single-well application. The Board did not resolve the competition on pure timing grounds — it evaluated the substance of each proposal against the existing regulatory framework. That approach is the right one when an established TSU operator’s expansion request competes with a pending application for the same acreage.

Continental recommends that when this situation arises, the Board apply the following standard: priority should be given to the expansion application filed by the established TSU operator where (a) the expansion is consistent with the existing unit’s development plan and the Board’s prior orders governing that unit; (b) the expanding operator holds a working interest in the expansion acreage sufficient to confer both the legal right and the practical capability to develop; and (c) approval of the expansion would produce more orderly development of the affected acreage than the competing proposal — avoiding the duplication of facilities, surface disturbance, and operational conflict that the Board has consistently identified as consequences of competing operators within the same formation.

Where the competing application was filed first and has achieved the status of a first-fully-approvable-permit under the Board’s established practice, that prior status should receive appropriate weight. But the mere existence of a competing application — particularly one filed by a party with nominal working interest and no demonstrated development capability — should not bar an established operator from seeking a logical and development-consistent expansion of an existing unit.

⁸ Board Order No. 47-2021 (June 10, 2021) addressed Bison’s application to designate an overlapping TSU over an existing permanent spacing unit operated by Grayson Mill in Sections 12, 13, and 24, T26N-R58E, Richland County; the Board denied the application, concluding that designation without the consent of the operator or a majority of interest owners does not promote orderly development and negatively impacts correlative rights. Board Order No. 48-2021 (June 10, 2021) addressed Bison’s application for drilling permits within a spacing unit operated by Slawson (94.22% working interest); Bison held 0.29% working interest. The Board denied Bison’s application and approved Slawson for additional wells, concluding that authorizing multiple operators in the same spacing unit creates uncertainty, conflict, and unnecessary surface disturbance.

The independence of the underlying unit across all three scenarios. Regardless of which scenario applies and how the Board resolves an expansion request, one principle remains constant: the outcome of an expansion proceeding does not affect the validity or durability of the underlying TSU. If the Board denies an expansion request — whether because the totality of circumstances does not support approval, consent is lacking, or a competing application has priority — that denial is limited to the specific expansion sought. It is not a finding that the existing TSU is invalid, that it should be reconfigured, or that a third party may now challenge its continued existence on the basis of the denied expansion.

This principle is particularly important in Scenario C. A competitor who defeats an expansion application should not be able to use that outcome as evidence that the original operator is failing to develop, and therefore as a foothold to challenge the underlying TSU. The expansion proceeding and any challenge to the underlying unit are analytically and procedurally independent. Any challenge to the underlying unit must be brought as a separate proceeding under the material-changed-circumstances standard described in Section II.C, with the burden on the petitioner. The Board should make this independence explicit so that expansion proceedings cannot be used as a roundabout mechanism to destabilize existing spacing rights.

III. DRILLING PERMIT DURATION AND RENEWAL

A. The Current Six-Month Term Is Inconsistent with Modern Development Timelines

Montana's current six-month drilling permit term should be extended to 24 months. It is a significant outlier among the states in which Continental operates and reflects a permitting environment that predates modern horizontal pad development.

From the point at which Continental obtains a TSU order and begins moving toward a first well, the typical path to spud involves geological modeling and petrophysical analysis of the target formation; lease aggregation and title confirmation across a full section; negotiation and execution of surface use agreements; coordination with midstream providers on gathering infrastructure, water handling, and power; multi-well pad design; capital budget approval; and rig scheduling and contractor procurement. In Continental's experience, that process reliably takes 18 to 24 months under efficient execution. A six-month permit window does not accommodate this reality.

A drilling permit in the Bakken/Three Forks context is not merely permission to drill a hole. It is authorization to produce hydrocarbons from a shared reservoir in which all interest owners hold correlative rights. That distinction matters for how the Board evaluates competing applications. The statutory mandate under § 82-11-201, MCA — waste prevention, correlative rights protection, orderly development — does not terminate at the point of permit issuance. It runs through the entire development and production lifecycle. An evaluation framework that treats permit approval as purely a procedural exercise, divorced from the applicant's actual capacity to develop and produce the reservoir in a manner consistent with the statute, is incomplete. The Board's authority to consider development capability is not incidental to the permitting process — it is inherent in it.

The consequence is that operators must refile every six months, with each renewal creating a procedural occasion for third-party challenges. The Board's February 2026 session illustrates what this cycle looks like at scale: in that single session, the Board was required to adjudicate

fifteen competing drilling permit applications — all arising from the same area, involving the same spacing framework, in proceedings that consumed substantial Board time, staff resources, and legal expense on all sides. (See Board Order Nos. 79-2026 through 93-2026, summarized in Exhibit B.) A 24-month permit term would have reduced the conditions that contributed to that docket. The Board's record in February 2026 also demonstrates something more fundamental: when the Board evaluated those competing permit applications, it consistently applied a simple and workable rule—priority to the first-fully-approvable-permit, based on compliance with publication requirements, application completeness, bonding, and spacing unit approval. The Board stated this as "established practice" in the Conclusions of Law of at least nine separate orders. That rule works. A 24-month permit term would allow it to work without the constant pressure of expiration-driven refiling.⁹

B. The Interstate Comparison Supports a 24-Month Term

Every state in Continental's operational footprint provides a longer permit window than Montana's six months. Continental also notes the experience of the Colorado Oil and Gas Conservation Commission, which extended its permit term from one year to two years in 2009 specifically to accommodate multi-well horizontal pad development—concluding in its written statement of basis that the shorter term no longer warranted retention given the increasing complexity of horizontal operations. Colorado is included in the comparison below not as a state in which Continental operates, but because the COGCC's documented rationale mirrors precisely the circumstances the Board is considering here. The table below summarizes the comparison:

State	Permit Term	Key Features
Montana (MBOGC)	6 months	Current framework — shortest permit term among the states compared. Continental proposes extension to 24 months.
Oklahoma (OCC)	18 months + 6-month extension	One extension on showing of no material change in conditions. Effective window up to 24 months. OAC § 165:10-3-1(h).
Wyoming (WOGCC)	2 years	Two-year APD exclusivity. Continued operatorship subject to Rule 8(m) challenge at each 2-year anniversary of most recent spud. Eff. Dec. 19, 2019.
Colorado (COGCC)*	2 years	Extended from 1 to 2 years in 2009 to accommodate multi-well horizontal pad development. No extension; refile required. COGCC Order 1R-111.
Texas (RRC)**	2 years	Reapplication using original API number. R.R. Comm'n Form W-1 User Guide § B.8.
North Dakota (NDIC)	1 year	Renewable via Sundry Notice; no formal exclusive preference at renewal. Even this one-year term exceeds Montana's six months.

Of the five comparison states, four provide an effective two-year permit window; even North Dakota's one-year term exceeds Montana's six months. Montana's six-month term is not a different point on a spectrum—it is a structural outlier that imposes real administrative costs on operators, mineral owners, and the Board itself without any corresponding conservation benefit.

⁹ Board Order Nos. 79-2026, 80-2026, 81-2026, 84-2026, 85-2026, 88-2026, 89-2026, 90-2026, and 93-2026 (all Feb. 13, 2026). Each contains identical Conclusions of Law articulating the first-fully-approvable-permit rule as the Board's 'established practice,' determined by application completeness, publication requirements under A.R.M. 36.22.601, bonding, and spacing unit approval.

C. Renewal Preference and the Standard for Competition at Renewal

The original permittee should receive preference for renewal absent a showing of failure to act diligently, lack of technical or financial capability, or material changed circumstances. This standard is consistent with the Board's February 2026 articulation of the first-fully-approvable-permit doctrine and with the approach taken by peer states—Wyoming's Rule 8(m) being one instructive example of how a diligence-and-capability standard can be structured, without suggesting that framework be adopted here wholesale.

Continental is not opposed to meaningful competition for development rights. An operator who has not acted diligently, lacks the capability to develop the permitted location, or faces genuinely changed circumstances should not be entitled to indefinite preference. But competition should be tethered to those substantive criteria—not to the administrative artifact of a six-month permit window.

Specifically, Continental recommends:

- Another operator should be permitted to compete upon renewal only if it can demonstrate a working interest of sufficient size and character that the holder has both the legal right and the economic justification to proceed with development, and either (a) the original permittee has failed to act diligently, (b) the original permittee lacks technical or financial capability to develop the permitted location, or (c) there has been a material change in circumstances affecting the appropriateness of the original permittee's continued preference.
- Protest of a permit renewal should require a threshold showing of one of those conditions. A bare assertion of competing interest, without evidence of working interest ownership and development capability, should not require a hearing.
- Preference to the original operator should continue absent a demonstration of materially changed circumstances. An operator who obtained a permit through proper process, has maintained it in good standing, and can document active development planning is entitled to continued preference.

Continental is prepared to demonstrate diligence under any standard the Board adopts. Continental's internal processes—capital commitments, surface agreement execution, infrastructure coordination, and operational scheduling—provide a documentable record of development intent that the Board can evaluate at any interval it chooses.

The Board's consideration of these issues is also informed by the perspectives of Montana's largest institutional mineral owner. Montana Trust Lands—the state agency charged by law with managing mineral resources on behalf of Montana's public schools, and the entity responsible for over 6.2 million subsurface acres statewide—submitted a public comment to the Board at the February 2026 business meeting urging the Board to prioritize methodical, quality-focused development over speed. Montana Trust Lands stated directly that “the best way to develop this resource isn't necessarily the fastest way,” and further asked the Board to evaluate competing applications based on substantive development capability—including infrastructure readiness and well performance—rather than on administrative timing alone. That perspective is fully consistent with Continental's position here. A regulatory framework that displaces an established, diligent operator based solely on permit expiration—without any evaluation of

whether the challenger has meaningful working interest, genuine development capability, or a credible plan to serve royalty owners better—does not protect the mineral owners whose interests the Board is charged with protecting. It serves only the tactical filer. The Montana Trust Lands February 2026 public comment letter is attached as Exhibit C.

D. Minor Permit Modifications — Surface-Driven Changes Should Not Re-Open the Permit Process

Montana’s six-month permit term creates a practical problem that the Board’s framework does not currently address: an approved permit holder who must modify a permitted well design to address surface conditions — relocating the surface location, reversing the lateral orientation, or making comparable adjustments — should not be required to file a new permit application and re-expose the permitted location to third-party protest, provided the modification does not affect drainage, setbacks, or correlative rights. The operational reality of horizontal pad development is that surface conditions, infrastructure constraints, and right-of-way negotiations frequently require adjustments to wellbore path and orientation after a permit is approved. Requiring a new permit application in those circumstances effectively penalizes operators for the same surface complexity that makes the six-month term inadequate in the first place.

This circumstance is distinct from a substantive change in development approach. A modification that (a) keeps the lateral length, productive interval, and bottomhole location within the existing spacing order; (b) maintains the 500’ lateral and 200’ heel/toe setbacks; and (c) produces no material change in anticipated drainage or correlative-rights impacts is functionally a wellbore-path optimization, not a new development proposal. Peer states that Continental operates in — including North Dakota, Wyoming, and Oklahoma — treat adjustments of this kind as sundry or minor amendment matters where spacing and correlative-rights impacts are unchanged. Montana’s framework should reflect the same principle.

Continental recommends the Board establish that surface-driven permit modifications meeting the criteria above shall be processed by sundry notice (Form 2) rather than a new permit application under A.R.M. 36.22.601. The Board’s current rules address sundry notice authority for post-drilling wellbore modifications but do not expressly provide a mechanism for pre-spud design adjustments to a validly issued permit. A.R.M. 36.22.604 requires a new permit application if drilling has not commenced within six months of issuance, but is silent on design modifications within the permit period — leaving operators without a clear path to address surface-driven changes short of a full re-application. This gap should be closed by rule or formal policy. In that circumstance, the original permittee’s status as holder of the first-fully-approvable-permit should remain intact from the date of original approval. The modification should not re-open a protest window, invite competing permit applications for the same location, or affect the permittee’s priority position under the Board’s established practice. The first-fully-approvable-permit determination was made when the original permit was approved; a surface-driven path adjustment does not undo that determination.

IV. ADDITIONAL OBSERVATIONS

A. The First-Fully-Approvable-Permit Rule Warrants Codification — and Refinement for Simultaneous or Near-Simultaneous Filings

The Board's February 2026 session formally articulated, in the Conclusions of Law of multiple orders, that "when competing applications for permit to drill are filed within the same spacing unit, priority is given to the first fully approvable permit as determined by compliance with Board rules, including application completeness, publication requirements under A.R.M. 36.22.601, bonding, and spacing unit approval." The Board described this as its "established practice." (See Board Order Nos. 79-2026, 80-2026, 81-2026, 84-2026, 85-2026, 88-2026, 89-2026, 90-2026, and 93-2026, summarized in Exhibit B.)

Continental recommends that the Board codify this rule through a formal policy statement or rule amendment. In the typical case — where one operator has pursued the permitting process diligently and a competitor files later — the first-fully-approvable-permit rule is both efficient and sound. It rewards procedural compliance, provides a clear and predictable standard, and eliminates the incentive to use the protest process as a tactical tool. Codification would reduce the volume of contested permit proceedings by giving all parties a bright-line standard they can apply before filing.

The rule does, however, present a distinct question when two or more applications for the same location arrive within a period so short that no meaningful temporal priority can be established. In that circumstance, a pure timestamp rule provides no useful guidance, and the Board would benefit from a supplemental framework for determining which applicant should proceed.

Peer states have addressed versions of this problem in different ways, and the experience is instructive. North Dakota's Industrial Commission, facing a surge of tactical minority working interest APDs, developed a multi-factor capability and circumstances standard — codified at NDAC § 43-02-03-16.2 — that asks regulators to consider the technical ability of each applicant to drill and complete the well, each applicant's experience in similar operations, the number of wells each operates in the area, and other relevant circumstances. Wyoming, which confronted a related problem of permit stockpiling, adopted a rule under which all simultaneously filed applications are provisionally approved, with exclusivity going to the first operator to affirmatively declare intent to drill — effectively a commitment test rather than a timestamp test. Oklahoma resolves competition at the permit stage through its spacing and pooling hearing process, where operatorship and development rights are determined on the merits. In each case, the underlying recognition is the same: when timing alone cannot establish meaningful priority, the question of who should develop a given location is better answered by substance than by administrative sequence.

Continental recommends that the Board adopt a similar supplemental standard for near-simultaneous filings. For purposes of this standard, Continental recommends the Board define competing applications as near-simultaneous when the second application is filed within 30 days of the date of publication of the first application under A.R.M. 36.22.601 — a timeframe that aligns with the practical time required to prepare a complete competing application while providing a clear, administrable boundary. When two or more applications fall within that window such that no clear priority can be established on timing alone, the Board should evaluate: (a) the technical and financial capability of each applicant to develop the permitted location; (b) each applicant's operational experience in the relevant play and formation; (c) the extent and character of each applicant's working interest in the spacing unit; and (d) each applicant's

demonstrated development intent, including capital commitments, infrastructure coordination, surface agreements, and other tangible evidence of readiness to drill. A bare showing of working interest ownership, without demonstrated development capability, should not be sufficient to prevail.

Each of these factors is directly relevant to the Board's statutory mandate under § 82-11-201, MCA: technical and financial capability and demonstrated development intent bear on waste prevention; working interest ownership bears on correlative rights protection; and operational experience bears on orderly development. The near-simultaneous standard is not a departure from the statutory criteria — it is an application of them. Resolving competing applications on this basis is precisely what the statute requires the Board to do.

The term “approvable” in this context should not be read to mean merely technically complete. An application that satisfies publication requirements, bonding, and spacing unit approval, but is submitted by an operator without the technical capability, infrastructure access, or financial capacity to actually develop the permitted location, does not serve the Board's statutory mandate regardless of its formal completeness. Approving such an application — and denying a competing application from an operator with demonstrated capability — would produce exactly the outcome the statute is designed to prevent: waste of a shared resource and deprivation of correlative rights. The Board's “established practice” on first-fully-approvable permits should be understood accordingly.

This approach complements rather than displaces the first-fully-approvable-permit rule. In the vast majority of cases, timing will be determinative and the existing rule will apply cleanly. The supplemental framework addresses the narrower circumstance where it cannot — and the 30-day publication window ensures that circumstance is defined precisely enough to be administrable.

A related application of the first-fully-approvable-permit doctrine warrants explicit recognition. Where a permit application is filed by the original TSU applicant within 180 days of TSU establishment, that application should be treated as having presumptive priority over any competing application filed during the same window. The basis for this presumption is not a new procedural right — it is a logical extension of what the Board's existing doctrine already reflects. The TSU establishment process requires published notice, opportunity for all affected parties to appear, and a Board decision on the merits. An operator who has invested in that process has effectively given the market notice of its development intentions. A competing permit application filed before the TSU applicant has had a reasonable opportunity to complete the permit publication process under A.R.M. 36.22.601 serves no conservation purpose and is, in the Board's own framework, almost certainly not the product of diligent independent development planning.

Treating the original TSU applicant's timely permit application as presumptively first-fully-approvable during this window is consistent with the Board's articulated rationale for the doctrine — rewarding procedural diligence and discouraging tactical filings — and gives that rationale meaningful force in the specific context where tactical interference is most likely to occur.

B. Working Interest Ownership and Development Capability

The extent to which working interest ownership should be considered in spacing and permitting decisions is currently underspecified in Montana's regulatory framework. That ambiguity creates a structural incentive for entities to acquire nominal interests and file APDs as a tactical measure, without genuine development intent or capability.

The Board's February 2026 findings acknowledged this dynamic directly. In Board Order Nos. 82-2026 and 83-2026, the Board found that "authorizing a second operator to drill additional wells within the same existing spacing units would create uncertainty regarding future development of the pool, increase the likelihood of conflict among interest owners, and increase the potential for unnecessary duplication of facilities and surface disturbance." Connecting working interest ownership to development preference—as Wyoming's Rule 8(m) does—would reduce these dynamics and ensure that development rights are held by operators with genuine stakes in the acreage.¹⁰

C. The Board's Record Is Its Greatest Asset in This Proceeding

Continental's comprehensive review of fifteen years of Board orders reveals what no single proceeding can fully capture: the MBOGC has administered a remarkably consistent regulatory framework across a long period of volatile conditions. Competing operators, market disruptions, and contested proceedings have all tested that framework—and the Board's core principles have held. The standards the Board has applied to contested spacing and permitting questions are principled, statutory, and workable.

The purpose of this Request for Public Comment is not to correct a broken framework. It is to make explicit what has always been implicit—to give operators, mineral owners, and the public a clear statement of the rules that the Board has consistently followed. Continental is confident that such a statement, grounded in the Board's own record, will strengthen Montana's regulatory environment and the investment confidence that comes with regulatory certainty.

V. CONCLUSION

Continental appreciates the Board's willingness to examine these issues openly and to invite input from operators with direct experience in Montana's regulatory framework. The positions set forth above are grounded in Continental's operational experience, informed by the Board's own fifteen-year order record, and oriented toward the Board's statutory objectives: prevention of waste, protection of correlative rights, and orderly development of Montana's oil and gas resources.

Continental's core recommendations are straightforward:

- The one-year timing condition in TSU orders applies to the setback authorization, not the TSU itself—consistent with the Board's historical drafting practice and its own

¹⁰ Board Order Nos. 82-2026 and 83-2026, Docket Nos. 2-2026 and 8-2026 (Feb. 13, 2026). Finding of Fact No.9, common to both orders. The same language and legal conclusion appear in Board Order Nos. 86-2026, 87-2026, 91-2026, and 92-2026 from the same session.

description of that practice in Board Order Nos. 309-2025 through 313-2025.¹¹The Board should make this explicit in a formal policy statement so that the setback condition cannot be misread as a unit expiration trigger.

- An established TSU may not be vacated or reconfigured based on passage of time or a competing operator's proposal alone. Reconfiguration requires a material change in circumstances, demonstrated by the petitioner. The Board's fifteen-year record confirms it has never acted otherwise.
- The outcome of a modification or expansion proceeding does not affect the validity of the underlying TSU. A denied expansion cannot serve as a foothold to challenge the existing unit; any such challenge must be brought separately under the material-changed-circumstances standard, with the burden on the petitioner.
- Drilling permit terms should be extended to 24 months. Four of five comparison states provide an effective two-year window; Montana's six-month term is a structural outlier with no conservation justification. The original permittee should receive renewal preference absent a diligence-based showing to the contrary.
- The first-fully-approvable-permit rule should be codified as formal Board policy. Where timing is determinative, priority goes to the first fully approvable permit. Where a competing application is filed within 30 days of the date of publication of the first application under A.R.M. 36.22.601, the applications are near-simultaneous and the Board should resolve the competition on the merits — evaluating capability, experience, working interest, and demonstrated development intent — consistent with its approach in Board Order No. 49-2021.

Continental welcomes the opportunity to discuss these comments further, answer any questions the Board or staff may have, and looks forward to participating in the April 8, 2026, Board business meeting.

Respectfully submitted,



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¹¹ Board Order Nos. 309-2025 through 313-2025, Docket Nos. 374-2025, 375-2025, 384-2025, 385-2025, and 386-2025 (Dec. 11, 2025). Finding of Fact No. 12.

EXHIBIT A

Interstate Regulatory Comparison — Temporary Spacing Units, Permit Duration, and Operatorship

Prepared in Connection with Continental's Written Comments to the Montana Board of Oil and Gas Conservation, March 25, 2026

Issue	Montana (MBOGC) [Current]	North Dakota (NDIC)	Oklahoma (OCC)	Wyoming (WOGCC)	Colorado (COGCC)*	Texas (RRC)**
Spacing Unit Size	1280-acre TSUs; temporary with 500' or 1320' setbacks	1280-ac. standup standard; 2560-ac. overlapping units common	640–1280 ac.; horizontal max 1280 ac.	Primarily 1280-ac. DSUs; pool-specific variations	~640–1280 ac.; operator-configured within COGCC field rule limits	Lease-based system; no mandatory spacing units. Operators may pool voluntarily; Railroad Commission does not impose forced unitization for production.
Drilling Permit Duration	6 months — outlier among peer states	1 year; renewable via Sundry Notice	18 months; one 6-month extension	2-year APD exclusivity; continued operatorship subject to Ch. 3, §8(m)	2 years; no extension; refile required. Eff. COGCC Order 1R-111 (2009)	2 years from approval; reapplication using original API number. R.R. Comm'n Form W-1 User Guide § B.8.
Spacing Unit Finality	No clear policy for 500' TSUs; 1320' units require consent or material change to modify	Orders generally final; modification requires new application	Final after notice and hearing; non-development not a sufficient basis for modification	DSU geometry durable; §8(m) governs who may drill within unit, not unit reconfiguration	Treated as extraordinary remedy; Commission reserves right to alter after notice and hearing	No spacing order framework analogous to Montana's TSU structure; lease terms and voluntary agreements govern acreage control.
Spacing Unit Duration	Indefinite; no automatic expiration. Modification requires new application and hearing or applicant consent	Indefinite; spacing orders do not expire. Modification or vacation requires new application; non-development alone not sufficient basis	Indefinite after notice and hearing; non-development not a sufficient basis for modification; new application required.	DSU geometry durable and indefinite; §8(m) governs operatorship within the unit, not unit reconfiguration.	Spacing orders treated as durable; Commission reserves authority to alter after notice and hearing but views modification as extraordinary remedy	No spacing order framework; lease terms govern duration of development rights.
Operatorship / First-to-File	First-to-file APD; no formal capability or	First-to-file; NDIC can suspend where minority WI filings create conflicts	Operatorship resolved through spacing/pooling	First-to-file creates 2-yr DSU exclusivity; 8(m) challenge on	Operator designated in permit; no commission-	First-to-file permit; no commission-level

Issue	Montana (MBOGC) [Current]	North Dakota (NDIC)	Oklahoma (OCC)	Wyoming (WOGCC)	Colorado (COGCC)*	Texas (RRC)**
	WI evaluation standard		and private agreements; no commission-level contest	diligence/capability grounds	level operatorship contest mechanism	operatorship contest mechanism. Operatorship resolved through private lease and JOA terms.
Working Interest Considered?	Unclear / inconsistent — area needing greater clarity	Yes — NDIC polices minority WI abuse through suspension/revocation	Yes — force pooling and risk penalty framework ties rights to WI ownership	Yes — 8(m) challengers must show WI ownership and development capability. Ch. 3, §8(m)(i)(C)	Not formally weighted at permit stage; WI economics resolved through voluntary pooling and lease terms	Not formally weighted at permit stage; resolved through private lease terms and voluntary pooling arrangements.
Permit Renewal / Preference	Original operator given preference at 6-month renewal; Continental proposes 24-month term with diligence standard	No formal exclusive preference at renewal; refile via Sundry Notice	One 6-month extension on showing of no material change; operator must refile thereafter	2-yr initial APD exclusivity; continued operatorship may be challenged under §8(m) at 2-yr anniversary	No extension; operator refiles; no formal preference at reapplication	2-year permit; operator refiles using original API number. No formal preference standard at reapplication.

Notes:Oklahoma: Okla. Admin. Code § 165:10-3-1(h)(1)–(2). Wyoming: Wyo. Oil & Gas Conservation Comm'n Rules & Regs., Ch. 3, § 8(1)–(m), eff. Dec. 19, 2019. Colorado: COGCC Order No. 1R-111, Statement of Basis (Nov. 30, 2009); COGCC Rule 303.j.(1). Texas: R.R. Comm'n of Tex., Form W-1 User Guide § B.8. *Colorado is included as a relevant Rocky Mountain oil and gas regulatory comparison. The COGCC extended its permit term from one year to two years in 2009 specifically to accommodate multi-well horizontal pad development, finding that the shorter term no longer warranted retention given the increasing complexity of horizontal operations. Continental does not operate in Colorado. **Texas is included for permit duration comparison only. Texas operates under a lease-based system without forced pooling or mandatory spacing units; its operatorship and spacing framework is not directly analogous to Montana's TSU structure.

EXHIBIT B

Relevant Board Orders — February 2011 through February 2026

Continental reviewed all available Board orders during this period; the orders below were identified as having particular bearing on the issues presented.

Board Order No.	Docket No.	Hearing Date	Issue	Relevance
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Section I — Timing Language in TSU Orders

No. 406-2011	492-2011	Dec. 15, 2011	I	Whiting Oil & Gas — TSU setback amendment. Board's one-year validity language ("only valid for one year") expressly attached to the 500' setback authorization, not the TSU itself.
No. 409-2011	438-2011	Dec. 15, 2011	I	Whiting Oil & Gas — TSU setback amendment. "500' lateral setback is only valid for one year from the date of this order, after which time the lateral setback will be 1320'." Explicit reversion language confirms setback, not TSU, expires.
No. 204-2014	—	Jun. 19, 2014	I	Emerald Oil — Staff (Halvorson) business meeting statement: one-year condition attaches to setback authorization; if well not drilled, setback reverts to 1320', not TSU dissolution.
No. 205-2014	—	Jun. 19, 2014	I	Emerald Oil — companion order; same Halvorson statement and drafting practice confirmed.

Section II — Duration and Finality of TSU Orders

No. 30-1967	—	Aug. 2023	II	Order from 1967 processed approximately 56 years after issuance at applicant's request. No protest. Board acted without question.
No. 71-1997	—	Oct. 2023	II	Undrilled TSU from 1997 vacated approximately 26 years after issuance. Applicant-initiated. No protest.
No. 394-2004	—	Jun. 2013	II	Continental Resources — TSU from 2004 vacated approximately 9 years after issuance. Applicant-initiated. No protest.
No. 26-2021	25/26-2021	Apr. 8, 2021	II	Bison/Prima — Board amended TSU 10-2020 to remove expiration date entirely. Staff recommended removal because "the temporary spacing unit is appropriate and prevents tracts from being excluded from development." Strongest affirmation of TSU durability: Board eliminated commencement deadline rather than simply extending it.
No. 47-2021	50/51/52-2021	Jun. 10, 2021	II	Bison v. Grayson Mill (Continental appeared in opposition) — Board denied overlapping TSU over existing permanent spacing unit, Secs. 12/13/24, T26N-R58E, Richland Co. Board concluded designation without consent of operator or majority of interest owners negatively impacts correlative rights and does not promote orderly development. Dockets 50/51/52-2021.
No. 48-2021	24/56-2021	Jun. 10, 2021	II	Bison v. Slawson — Board denied competing operator (0.29% WI) permits to drill in spacing unit operated by Slawson (94.22% WI), Secs. 2/11, T26N-R59E, Roosevelt Co. Board concluded: authorizing multiple operators in same spacing unit creates uncertainty, conflict, unnecessary surface disturbance; statutes do not require recovery at particular rate. Slawson approved for additional wells; Bison denied. Dockets 24/56-2021.
No. 49-2021	57/58-2021	Jun. 10, 2021	II	Bison v. Prima — competing drilling permits, Secs. 1/12/13, T26N-R59E. Board resolved competition on merits, not timing alone: approved Prima's two-well proposal as consistent with prior Board Order 11-2020; denied Bison's single-well proposal. Establishes substance-over-timing approach to competing applications.
No. 164-2025	186-2025	Aug. 14, 2025	II	Kraken — TSU application, T28N-R56E. Phoenix protest rejected. Board found Kraken's plan promotes efficient and orderly development; competitor's absence from docket dispositive.
No. 165-2025	187-2025	Aug. 14, 2025	II	Kraken — TSU application. Phoenix protest rejected. Identical findings to Order No. 164-2025.
No. 166-2025	188-2025	Aug. 14, 2025	II	Kraken — TSU application. Phoenix protest rejected. Identical findings.

Board Order No.	Docket No.	Hearing Date	Issue	Relevance
No. 167-2025	189-2025	Aug. 14, 2025	II	Kraken — TSU application, Phoenix protest rejected. Identical findings.
No. 172-2025	222-2025	Aug. 14, 2025	II	Kraken — TSU application, Phoenix protest rejected. Identical findings.
No. 173-2025	223-2025	Aug. 14, 2025	II	Kraken — TSU application, Phoenix protest rejected. Identical findings.
No. 62-2026	58-2026	Feb. 13, 2026	II	Continental — three additional wells authorized, Secs. 1/12/13, T25N-R56E, Phoenix protest rejected.
No. 66-2026	59-2026	Feb. 13, 2026	II	Continental — three additional wells authorized, Secs. 2/11/14, T25N-R56E, Phoenix protest rejected.
No. 71-2026	60-2026	Feb. 13, 2026	II	Continental — three additional wells authorized, Secs. 3/10/15, T25N-R56E, Phoenix protest rejected.

Sections I and II — Timing and Duration (Phoenix v. Kraken / Heritage / Continental Contested Proceedings)

No. 228-2025	302-2025	Oct. 9, 2025	I, II	Kraken — revised overlapping TSU, T26N-R57E. Phoenix comprehensive protest rejected on all grounds: statutory compliance is the test; Phoenix's absence from docket dispositive; due process concerns outside scope of docket.
No. 229-2025	303-2025	Oct. 9, 2025	I, II	Kraken — additional well authorization within Order No. 228-2025 TSU. Phoenix protest rejected.
No. 230-2025	304-2025	Oct. 9, 2025	I, II	Kraken — overlapping TSU, T27N-R57E / T26N-R57E. Phoenix protest rejected. Identical findings to Order No. 228-2025.
No. 231-2025	305-2025	Oct. 9, 2025	I, II	Kraken — additional well authorization. Phoenix protest rejected.
No. 309-2025	384-2025	Dec. 11, 2025	I, II	Heritage / Continental — increased well density, T25N-R56E. Phoenix protest. Board articulated historical one-year practice 'even where not expressly stated in the order.' Concerns re: third-party vacatur of TSUs with active permits. Continued to Feb. 12, 2026.
No. 310-2025	374-2025	Dec. 11, 2025	I, II, III	Heritage / Continental — drilling permit renewal, T25N-R56E. Phoenix protest. Identical findings to Order No. 309-2025. Continued to Feb. 12, 2026.
No. 311-2025	385-2025	Dec. 11, 2025	I, II	Heritage / Continental — increased well density. Continued to Feb. 12, 2026. Identical findings.
No. 312-2025	375-2025	Dec. 11, 2025	I, II, III	Heritage / Continental — drilling permit applications. Phoenix protest. Continued to Feb. 12, 2026.
No. 313-2025	386-2025	Dec. 11, 2025	I, II	Heritage / Continental — increased well density. Continued to Feb. 12, 2026. Identical findings.

Sections I and III — Timing and Permit Duration (Commencement Deadline Extensions)

No. 213-2025	283-2025	Oct. 9, 2025	I, III	Kraken — commencement deadline extension, T24N-R59E. Phoenix protested two-year increment; Kraken agreed to one year; granted over protest.
No. 214-2025	284-2025	Oct. 9, 2025	I, III	Kraken — commencement deadline extension. Same pattern as Order No. 213-2025.
No. 215-2025	285-2025	Oct. 9, 2025	I, III	Kraken — commencement deadline extension. Same pattern.
No. 216-2025	286-2025	Oct. 9, 2025	I, III	Kraken — commencement deadline extension. Same pattern.
No. 217-2025	287-2025	Oct. 9, 2025	I, III	Kraken — commencement deadline extension. Same pattern.
No. 218-2025	288-2025	Oct. 9, 2025	I, III	Kraken — commencement deadline extension. Same pattern.
No. 219-2025	289-2025	Oct. 9, 2025	I, III	Kraken — commencement deadline extension. Same pattern.

Board Order No.	Docket No.	Hearing Date	Issue	Relevance
No. 220-2025	290-2025	Oct. 9, 2025	I, III	Kraken — commencement deadline extension. Same pattern.
No. 221-2025	291-2025	Oct. 9, 2025	I, III	Kraken — commencement deadline extension. Same pattern.

Sections II and III — Duration and Permit Duration

No. 79-2026	374-2025	Feb. 13, 2026	II, III	Continental v. Phoenix — competing drilling permits, Secs. 3/10/15, T25N-R56E. Continental held first fully approvable permit; Continental approved. State 15-10-3 wells; Phoenix denied.
No. 80-2026	375-2025	Feb. 13, 2026	II, III	Continental v. Phoenix — competing drilling permits, Secs. 2/11/14, T25N-R56E. Continental first approvable; permit renewal approved; Phoenix denied.
No. 81-2026	467-2025	Feb. 13, 2026	II, III	Continental v. Phoenix — competing drilling permits, Secs. 1/12/13, T25N-R56E. Continental first approvable; Phoenix denied.
No. 82-2026	2/8-2026	Feb. 13, 2026	II, III	Kraken v. Phoenix — drilling permits, Roosevelt Co. Board articulated single-operator principle: authorizing multiple operators in same spacing unit creates uncertainty, conflict among interest owners, unnecessary surface disturbance. Statutes do not require recovery at particular rate. Phoenix denied.
No. 83-2026	8-2026	Feb. 13, 2026	II, III	Kraken v. Phoenix — drilling permits, T28N-R56E. Identical findings and conclusions of law to Order No. 82-2026.

Section III — Drilling Permit Duration and Renewal

No. 89-2026	22/45-2026	Feb. 13, 2026	III	Continental Buckley 2-4H — competing permits, Secs. 4/9/16/21, T25N-R56E. Continental first approvable; Phoenix denied.
No. 90-2026	24/44-2026	Feb. 13, 2026	III	Continental SGA 1-32H — competing permits, Secs. 17/20/29/32, T26N-R56E. Continental first approvable; Phoenix denied.
No. 93-2026	31/43-2026	Feb. 13, 2026	III	Continental J-DUB 1-33H — competing permits, Secs. 16/21/28/33, T26N-R56E. Continental first approvable; Phoenix denied.
No. 84-2026	3/12/13/38-2026	Feb. 13, 2026	III	Kraken v. Phoenix — competing permits, T26N-R56E / T27N-R56E. Board stated first fully approvable permit rule as 'established practice' in Conclusions of Law. Kraken approved; Phoenix denied.
No. 85-2026	38-2026	Feb. 13, 2026	III	Kraken v. Phoenix — competing permits. Same established practice stated. Kraken approved; Phoenix denied.
No. 86-2026	6-2026	Feb. 13, 2026	III	Kraken v. Phoenix — drilling permits, T24N-R58E. Kraken drilling commenced; Phoenix denied.
No. 87-2026	9-2026	Feb. 13, 2026	III	Kraken v. Phoenix — drilling permits, T28N-R56E. Kraken permit valid and compliant; Phoenix denied.
No. 88-2026	14/47-2026	Feb. 13, 2026	III	Heritage v. Phoenix — competing drilling permits, Secs. 5/8, T25N-R57E, Richland County. Heritage's permit was the first fully approvable under Board rules. Board stated established practice in Conclusions of Law. Heritage approved; Phoenix denied.
No. 91-2026	29-2026	Feb. 13, 2026	II, III	Kraken v. Phoenix — drilling permits, Secs. 4/9/16/21, T27N-R56E, Richland/Roosevelt Counties. Board stated single-operator principle in Conclusions of Law: authorizing multiple operators in same spacing unit creates uncertainty, conflict among interest owners, unnecessary surface disturbance. Phoenix denied.
No. 92-2026	30-2026	Feb. 13, 2026	II, III	Kraken v. Phoenix — drilling permits, Secs. 3/10/15/22, T27N-R56E, Richland County. Identical findings and conclusions of law to Order No. 91-2026. Phoenix denied.

Notes: Orders are identified by the Board's official numbering convention (No. [number]-[year]). Docket numbers reflect the original application docket. Where multiple dockets were consolidated for hearing, the primary docket is listed. Orders marked "—" in the Docket column predate Continental's review period or docket numbers are not separately confirmed in the available record. Issue column references correspond to the three issues identified in the Board's February 24, 2026 Request for Public Comment.

EXHIBIT C

Public Comment Letter of Montana Trust Lands (DNRC) to the Montana Board of Oil and Gas Conservation

February 11, 2026

[Montana Trust Lands February 11, 2026 Public Comment Letter to Follow]



February 11, 2026

Montana Board of Oil and Gas

Public Comment – February Business Meeting

Dear Board and Staff,

As you are all aware, over the past 18 months, we have seen a considerable increase in the number of operators looking to space and drill wells in the Montana Bakken. As a mineral owner, this is certainly welcome and exciting. However, it does not come without challenges.

Montana trust lands owns a considerable amount of mineral acreage near Culbertson, Montana (attached map). These lands are the subject of many of the applications you have heard and will hear tomorrow. As a significant royalty interest owner in the area, we are asking the Board and staff to consider the following in their decision making, especially when hearing competing applications:

1. **Methodical and Responsible Development** – Bakken wells typically produce 40-60% of their expected ultimate recovery (EUR, how much total oil is produced) within the first year of production. That means for wells to be economic, timing matters and so does pricing. While oil prices have rallied in the past couple of months, most would still consider the prices to be low or moderate. Extending the length of a lateral to four or five miles might make a well economic at lower prices, but it may not be the best way to develop the overall resource.
2. **Gas takeaway matters to royalty owners** - Pipeline infrastructure has always been an issue in the Montana Bakken, but the pipeline companies are finally starting to catch up. When considering two competing proposals, please know that the ability to quickly connect to a gas pipeline is important. Royalty owners receive no money on flared gas, and fractional amount of money on gas sold to companies like Crusoe for bitcoin mining or AI generation. Gas pipeline sales are not insignificant from a royalty owner's perspective. During primary production, a four well pad that produces 150,000 mcf per month at \$3.50/mcf would pay \$105,000 per month to royalty owners. That might be nominal to operators, but it's not to families and it's not to the schools of Montana.
3. **Operatorship and Well Performance** – Montana trust lands encourages the Board and staff to conduct a comparative analysis of well performance by operator. If it is found that certain companies drill, complete, and operate better and higher performing wells than other companies, it is within your authority to consider this information when hearing

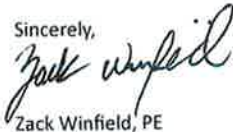


competing applications. This prevents waste and protects correlative rights. We also encourage the staff to periodically audit the EUR's presented to the Board in economic exhibits.

It's likely that we will only have one chance at developing the resource in this area, and Montana trust lands on behalf of the public schools of Montana, wants to ensure that it is done the right way. If that means drilling only one well in a unit instead of four while allowing pricing to increase, or pipeline infrastructure to be built out, we support that. Drilling wells just for the sake of drilling them doesn't make sense. The best way to develop this resource isn't necessarily the fastest way.

Thank you for your consideration. I'd be happy to answer any questions the Board or staff may have.

Sincerely,



Zack Winfield, PE

Petroleum Engineer – Montana Trust Lands

DNRC-FTLD-MMB

zackary.winfield@mt.gov

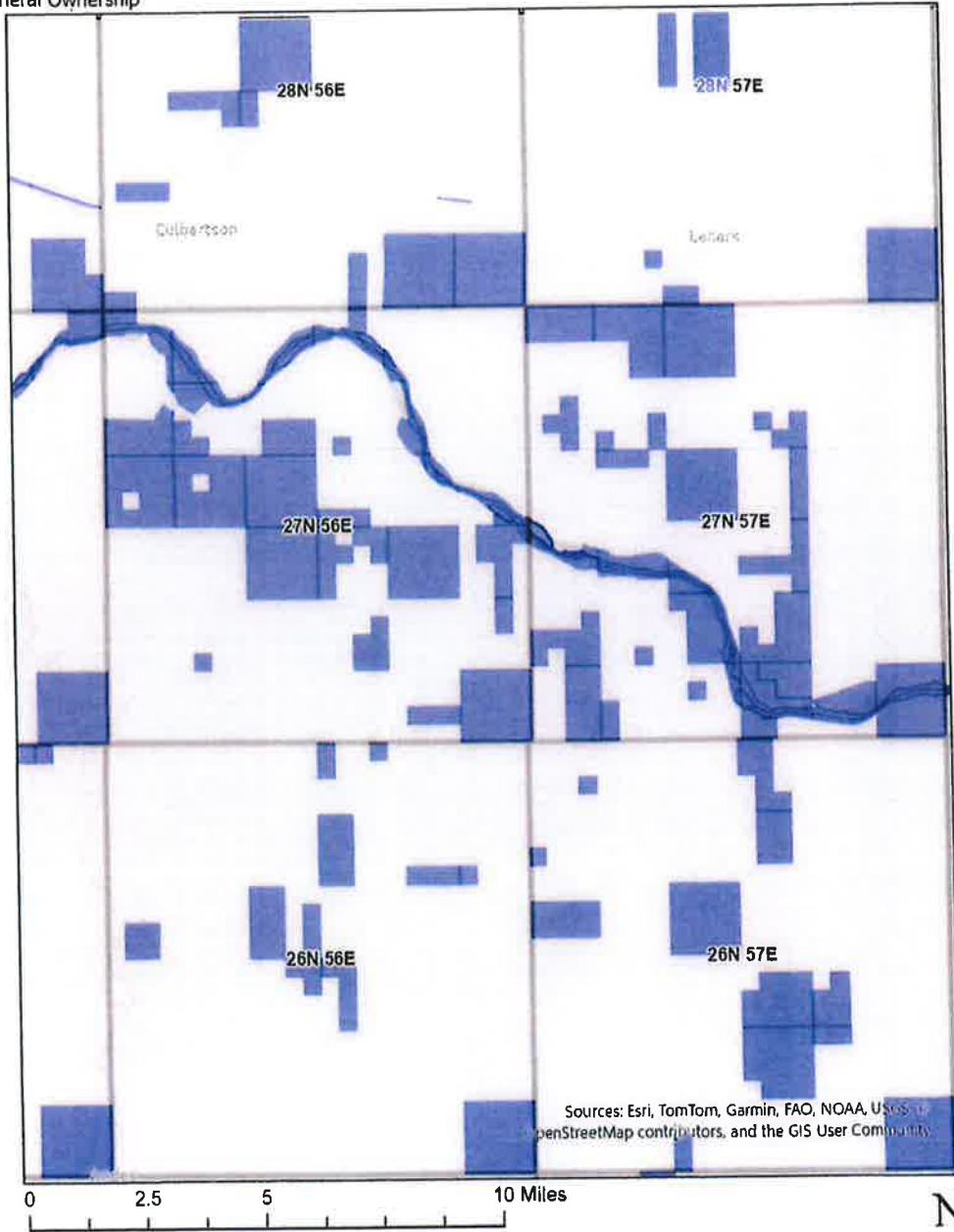
406-444-9518



Legend

Montana Trust Lands Oil and Gas Ownership Map Richland and Roosevelt Counties, MT

- PLSS Township
- Trust Lands Oil & Gas Mineral Ownership





1001 Fannin Street, Suite 1500
Houston, TX 77002
O 281.404.9500
F 281.404.9501

Montana Board of Oil & Gas Conservation
Attn: Mr. Ben Jones
2535 St. Johns Avenue
Billings, MT 59102

Sent via Email

Mr. Jones,

This letter is in response to your February 24, 2026 correspondence to Montana operators soliciting public comment regarding temporary spacing and permitting. We appreciate the Board's willingness to seek operator input on these important matters.

Chord Energy, LLC operates in Montana through its subsidiaries Oasis Petroleum North America LLC and Whiting Oil and Gas Corporation (collectively, "Chord"). Chord is among the longest-standing Bakken operators in Montana, having drilled its first Montana well in 2008. Since that time, Chord has remained one of the State's largest oil and gas producers. In 2025, Chord drilled Montana's first four-mile lateral and, in coordination with the Board and other stakeholders, we have begun preparations for a meaningful increase in development activity in 2026. We look forward to continuing our long-term investment in Montana.

Despite this commitment, development in Montana has recently encountered several headwinds that create uncertainty for Chord and other prudent operators. In the past several months, Chord has experienced: (i) a protest of a TSU approved at the immediately preceding hearing, while Chord was actively preparing permits and surface operations therein; (ii) competing permit filings within a recently approved TSU as Chord was preparing its own permits promptly following TSU approval; and (iii) permit filings by another operator within a PSU that Chord has operated for more than a decade.

These types of actions create an unpredictable operating environment that is inconsistent with the Board's pragmatic efforts to promote orderly development of Montana's resources. They introduce investment risk, complicate long-term planning for operators and midstream counterparties, and divert both operator and Board resources away from efficient development. More broadly, as industry consolidation continues and capital allocation becomes increasingly disciplined, investment will naturally be directed toward locations that provide development certainty and regulatory stability.

To further clarify and, in some cases, better align regulatory oversight with the goals of orderly development, protection of correlative rights, and prevention of waste, Chord respectfully offers the following for the Board's consideration:

- TSUs should include a three-year period for commencement of development (a "Development Window")
- During the Development Window, only the original applicant, its successors, or a significant working interest owner should be permitted to propose modifications to the TSU
- TSUs consisting wholly or partially of a valid PSU producing from the same pool should not be subject to a required Development Window
- Permit applications within a TSU should give preference to the TSU applicant and/or the operator with the larger working interest position
- Permit terms should be at least one year in duration
- Permits should not be subject to challenge until at least the one-year renewal period, except in extenuating circumstances as determined by the Board on a case-by-case basis

These recommendations are based on Chord's operational experience and are intended to address factors that have impeded efficient and orderly development. We have sought to present a concise and practical framework that aligns with the Board's statutory objectives and supports the interests of all stakeholders.

We appreciate the opportunity to provide these comments and would welcome the opportunity to discuss them further.

Sincerely,



Jason Weddle
Sr. Director, Land
Chord Energy, LLC

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

IN THE MATTER OF BAD WATER DISPOSAL, LLC FOR
FAILURE TO PAY THE ANNUAL INJECTION FEE FOR ITS
FLB SPOKANE 3 WELL IN RICHLAND COUNTY,
MONTANA, IN ACCORDANCE WITH ARM 36.22.1423.

ADMINISTRATIVE ORDER 3-A-2026

Bad Water Disposal, LLC (Bad Water) is the operator of the FLB Spokane 3 well, API # 25-083-21259, located in the SE $\frac{1}{4}$ SE $\frac{1}{4}$ of Section 7, T22N-R60E, Richland County, Montana. In accordance with ARM 36.22.1423, a \$200 annual injection fee is due for each permitted injection well.

At the April 8, 2026, business meeting, staff reported that Bad Water has not paid the annual injection fee that was due on January 31, 2026. Staff made several attempts to contact the operator. At this meeting, the Board assessed Bad Water a \$100 per well late fee for failure to submit its injection well payment prior to the deadline.

IT WAS THEREFORE ORDERED by the Board that Bad Water is assessed a \$100 late fee for failure to pay the annual injection well fee by January 31, 2026. The total due in injection well fees and penalties is now \$300.

IT WAS FURTHER ORDERED that Bad Water must appear at the June 11, 2026, public hearing, and show cause, if any it has, why additional penalties should not be imposed for failure to pay the annual injection fee for its permitted injection well and the late fee assessed for nonpayment. Board staff has authority to dismiss the docket if Bad Water achieves compliance prior to the June 11, 2026, public hearing.

Dated this 8th day of April, 2026

Montana Board of Oil and Gas Conservation

Benjamin Jones, Administrator

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

IN THE MATTER OF R3 OPERATING CORPORATION FOR
FAILURE TO PAY THE ANNUAL INJECTION FEE FOR ITS
WELLS IN GARFIELD AND ROOSEVELT COUNTIES,
MONTANA, IN ACCORDANCE WITH ARM 36.22.1423.

ADMINISTRATIVE ORDER 4-A-2026

R3 Operating Corporation (R3) is the operator of two injection wells in Garfield and Roosevelt Counties, Montana. In accordance with ARM 36.22.1423, a \$200 annual injection fee is due for each permitted injection well.

At the April 8, 2026, business meeting, staff reported that R3 has not paid the annual injection fee that was due on January 31, 2026. Staff made several attempts to contact the operator. At this meeting, the Board assessed R3 a \$100 per well late fee for failure to submit its injection well payment prior to the deadline.

IT WAS THEREFORE ORDERED by the Board that R3 is assessed a \$200 late fee for failure to pay the annual injection well fee by January 31, 2026. The total due in injection well fees and penalties is now \$600.

IT WAS FURTHER ORDERED that R3 must appear at the June 11, 2026, public hearing, and show cause, if any it has, why additional penalties should not be imposed for failure to pay the annual injection fee for its permitted injection well and the late fee assessed for nonpayment. Board staff has authority to dismiss the docket if R3 achieves compliance prior to the June 11, 2026, public hearing.

Dated this 8th day of April, 2026

Montana Board of Oil and Gas Conservation

Benjamin Jones, Administrator

**MONTANA BOARD OF OIL AND GAS CONSERVATION
FINANCIAL STATEMENT
As of 3/30/2026
Fiscal Year 2026: Percent of Year Elapsed -75%**

		Budget	Expends	%	Remaining
Regulatory	Personal Services	1,446,189	858,388	59	587,801
UIC	Personal Services	377,882	223,791	59	154,091
	Total	1,824,071	1,082,179	59	741,892
Regulatory	Equipment & Assets	73,800	-	-	73,800
UIC	Equipment & Assets	16,200	-	-	16,200
	Total	90,000	-	-	90,000
Regulatory	Operating Expenses:				
	Contracted Services	178,926	80,063	45	98,863
	Supplies & Materials	57,042	43,479	76	13,563
	Communication	50,495	43,331	86	7,164
	Travel	20,886	13,527	65	7,359
	Rent	1,354	840	62	514
	Utilities	23,778	10,628	45	13,150
	Repair/Maintenance	61,081	25,331	41	35,750
	Other Expenses	36,118	18,193	50	17,925
	Total Operating Expenses	429,680	235,392	55	194,288
UIC	Operating Expenses:				
	Contracted Services	52,480	18,447	35	34,033
	Supplies & Materials	12,521	8,706	70	3,815
	Communication	11,084	7,941	72	3,143
	Travel	4,585	2,607	57	1,978
	Rent	297	184	62	113
	Utilities	5,219	1,660	32	3,559
	Repair/Maintenance	13,408	4,429	33	8,979
	Other Expenses	7,929	7,002	88	927
	Total Operating Expenses	107,523	50,977	47	56,546
	Total	537,203	286,369	53	250,834
Regulatory	Debt Services	15,163	14,932	98	231
UIC	Debt Services	3,328	3,278	98	50
	Total	18,491	18,210	98	281

	Budget	Expends	%	Remaining
Carryforward FY25				
Operating Expenses	31,345	-	0	31,345
Equipment & Assests	75,000	-	0	75,000
Total	106,345	-	0	106,345

Funding Breakout	2026 Total Budget	2026 Total Expends	%
State Special	2,469,765	1,386,758	56
Federal 2025 UIC (10-1-2024 to 9-30-2025)	137,000	137,000	100
Federal 2026 UIC (10-1-2025 to 9-30-2026)	137,000	-	0
Total	2,743,765	1,523,758	56

REVENUE INTO STATE SPECIAL REVENUE ACCOUNT

	FY 26	FY 25
Oil & Gas Production Tax	\$ 956,556	\$ 4,102,286
Oil Production Tax	897,632	3,842,344
Gas Production Tax	58,924	259,942
Drilling Permit Fees	75,700	16,675
UIC Permit Fees	227,600	232,630
Interest on Investments	253,054	455,947
Copies of Documents	1,157	(304)
Miscellaneous Reimbursements	-	14,974
TOTAL	\$ 1,514,067	\$ 4,822,207
Account Balance	\$ 12,101,871	

REVENUE INTO DAMAGE MITIGATION ACCOUNT

	FY 26	FY 25
RIT Investment Earnings:	\$ 274,065	-
July	-	-
August	36,325	-
September	31,938	-
October	32,263	-
November	42,113	-
December	31,683	-
January	34,122	-
February	35,484	-
March	30,136	-
April	-	-
May	-	-
June	-	-
Bond Forfeitures:	177,038	228,388
Interest on Investments	15,985	51,403
TOTAL	\$ 467,088	\$ 279,792
Account Balance	\$ 927,419	

REVENUE INTO GENERAL FUND FROM FINES

		FY 26
HAWLEY OIL LLP	7/18/2025	240
BAD WATER DISPOSAL LLC	8/8/2025	260
YELLOWSTONE PETROLEUMS	8/12/2025	20,080
QUINQUE INC	8/29/2025	100
DELPHI INTERNATIONAL INC	9/22/2025	80
SELECT WATER SOLUTIONS LLC	11/3/2025	2,000
MONTANA ENERGY COMPANY	12/9/2025	2,000
S & L ENERGY INC	12/31/2025	70
PHOENIX OPERATING LLC	1/2/2026	250
BALLANTYNE VENTURES LLC	1/16/2026	100
TEXAKOMA EXPLORATION & PRODUCTION LLC	1/28/2026	180
DIAMOND HALO GROUP LLC	1/30/2026	160
WELL DONE FOUNDATION INC	2/4/2026	240
HAWLEY OIL COMPANY	2/4/2026	860
R.C.S. OIL INC	3/23/2026	460
TOTAL		\$ 27,080

FEDERAL ORPHAN WELL PLUGGING CONTRACTS

<u>Name</u>	<u>Authorized Amt</u>	<u>Expended</u>	<u>Balance</u>	<u>Status</u>	<u>Expiration Date</u>
PLENTYWOOD PLUG AND RECLAIM WELLS	\$ 3,547,496	\$ 3,317,379	\$ 230,118	Under Contract	9/30/2026
PLENTYWOOD WEST PLUG AND RECLAIM WELLS	1,079,997	831,998	247,999	Under Contract	9/30/2026
ROUNDUP B PLUG AND RECLAIM WELL	157,992	155,745	2,247	Completed	9/30/2025
SHELBY 2 PLUG AND RECLAIM WELLS	610,693	505,864	104,830	Completed	9/30/2025
SHELBY 3 PLUG AND RECLAIM WELLS	363,788	185,701	178,086	Completed	9/30/2025
SHELBY 4 PLUG AND RECLAIM WELLS	250,800	209,000	41,800	Completed	9/30/2025
SHELBY H2S PLUG AND RECLAIM WELLS	218,430	196,340	22,090	Completed	9/30/2025
PLENTYWOOD WEST PLUG AND RECLAIM WELLS	1,602,967		1,602,967	Bond Forfeited	9/30/2025
ROUNDUP A PLUG AND RECLAIM WELL	3,579,402	3,498,162	81,241	Completed	9/30/2025
SIDNEY PLUG AND RECLAIM WELLS	1,804,940	1,804,940	-	Completed	9/30/2025
GLENDIVE DISTRICT PLUG AND RECLAIM WELLS	791,250	791,250	-	Completed	9/30/2025
SHELBY 1 PLUG AND RECLAIM WELLS	676,361	607,140	69,221	Completed	9/30/2025
ROUNDUP C PLUG AND RECLAIM WELLS	289,530	238,464	51,066	Completed	9/30/2025
CBM PLUG AND RECLAIM WELLS	281,300	230,700	50,600	Completed	9/30/2025
MURRAY 1 PLUG AND RECLAIM WELL	266,620	222,183	44,437	Completed	9/30/2025
TURNER 13-22 AND TORDALE 42-21 PLUG AND RECLAIM WELLS	133,503	111,253	22,251	Completed	9/30/2025
HANNAH 5 PLUG AND RECLAIM WELL	47,113	47,113	-	Completed	9/30/2025
STATE 8-8 PLUG AND RECLAIM WELL	44,965	44,965	-	Completed	9/30/2025
TOI AG STATION RECLAMATION	26,232	26,232	-	Completed	9/30/2023
TOTAL	\$ 15,773,378	\$ 13,024,427	\$ 2,748,950		

DAMAGE MITIGATION ACCOUNT CONTRACTS

<u>Name</u>	<u>Authorized Amt</u>	<u>Expended</u>	<u>Balance</u>	<u>Status</u>	<u>Expiration Date</u>
Bootstrap Plug and Reclaim 3 wells	\$ 713,685	\$ 713,685	\$ -	Completed	11/30/2025

OPERATING CONTRACTS

<u>Name</u>	<u>Authorized Amt</u>	<u>Expended</u>	<u>Balance</u>	<u>Status</u>	<u>Expiration Date</u>
Billings Janitorial	\$ 31,665	\$ 26,332	\$ 5,333	Under Contract	9/30/2026
Billings Lawn and Snow Removal	60,000	45,999	14,001	Under Contract	9/30/2026
Robert Stutz, Attorney at Law	75,000	41,183	33,818	Under Contract	9/30/2027
Americlean - carpet cleaning	1,353	1,353	-	Under Contract	5/1/2026
Shelby O&G Lease - \$1,821/month - Expires 5/31/31	-	-	-	Under Contract	5/31/2031
TOTAL	\$ 168,018	\$ 114,867	\$ 53,151		

Legal Services	
Expenditure Breakout	
<u>Case</u>	<u>Amt Spent</u>
BOGC Duties	\$ 41,183
Total	\$ 41,183

**Montana Board of Oil and Gas Conservation
Summary of Bond Activity**

EXHIBIT 5

2/11/2026 Through 4/7/2026

Approved

Dankbar, LLC Kevin MT	948 L2	Approved Amount: Purpose:	2/13/2026 \$4,500.00 Limited Bond
Certificate of Deposit	\$4,500.00 Independence Bank		ACT
DCT, LLC Missoula MT	971 D1	Approved Amount: Purpose:	2/24/2026 \$5,000.00 Domestic Well Bond
Certificate of Deposit	\$5,000.00 Stockman Bank of Montana		ACT
Hydra Services LLC Houston TX	824 T14	Approved Amount: Purpose:	3/26/2026 \$10,000.00 UIC Single Well Bond
Surety Bond	\$10,000.00 U.S. Specialty Insurance Co.		ACT
Roark, Daniel and Tina Oilmont MT	972 G2	Approved Amount: Purpose:	4/2/2026 \$1,500.00 Single Well Bond
Certificate of Deposit	\$1,500.00 FIRST STATE BANK OF SHELBY		ACT
Roark, Daniel and Tina Oilmont MT	972 G4	Approved Amount: Purpose:	4/2/2026 \$1,500.00 Single Well Bond
Certificate of Deposit	\$1,500.00 FIRST STATE BANK OF SHELBY		ACT
Roark, Daniel and Tina Oilmont MT	972 G5	Approved Amount: Purpose:	4/2/2026 \$1,500.00 Single Well Bond
Certificate of Deposit	\$1,500.00 FIRST STATE BANK OF SHELBY		ACT
Roark, Daniel and Tina Oilmont MT	972 G6	Approved Amount: Purpose:	4/2/2026 \$1,500.00 Single Well Bond
Certificate of Deposit	\$1,500.00 FIRST STATE BANK OF SHELBY		ACT
Roark, Daniel and Tina Oilmont MT	972 G3	Approved Amount: Purpose:	4/2/2026 \$1,500.00 Single Well Bond
Certificate of Deposit	\$1,500.00 FIRST STATE BANK OF SHELBY		ACT
Roark, Daniel and Tina Oilmont MT	972 G7	Approved Amount: Purpose:	4/2/2026 \$1,500.00 Single Well Bond
Certificate of Deposit	\$1,500.00 FIRST STATE BANK OF SHELBY		ACT
Roark, Daniel and Tina Oilmont MT	972 G1	Approved Amount: Purpose:	4/2/2026 \$5,000.00 Single Well Bond
Certificate of Deposit	\$5,000.00 FIRST STATE BANK OF SHELBY		ACT

Montana Board of Oil and Gas Conservation Summary of Bond Activity

2/11/2026 Through 4/7/2026

Approved

Sun Coulee, LLC Martinsdale MT	915 T4	Approved	3/26/2026
		Amount:	\$10,000.00
		Purpose:	UIC Single Well Bond
Certificate of Deposit	\$10,000.00	Stockman Bank of Montana	ACT
Tomahawk Oil Company, Inc. Roundup MT	7620 G4	Approved	3/27/2026
		Amount:	\$10,000.00
		Purpose:	Single Well Bond
Letter of Credit	\$10,000.00	FIRST SECURITY BANK OF ROUNDUP	ACT
Tomahawk Oil Company, Inc. Roundup MT	7620 G3	Approved	3/27/2026
		Amount:	\$10,000.00
		Purpose:	Single Well Bond
Letter of Credit	\$10,000.00	FIRST SECURITY BANK OF ROUNDUP	ACT
Tomahawk Oil Company, Inc. Roundup MT	7620 G5	Approved	3/27/2026
		Amount:	\$10,000.00
		Purpose:	Single Well Bond
Letter of Credit	\$10,000.00	FIRST SECURITY BANK OF ROUNDUP	ACT
Tomahawk Oil Company, Inc. Roundup MT	7620 T3	Approved	3/27/2026
		Amount:	\$10,000.00
		Purpose:	UIC Single Well Bond
Letter of Credit	\$10,000.00	FIRST SECURITY BANK OF ROUNDUP	ACT
True Oil LLC Casper WY	7840 T2	Approved	3/16/2026
		Amount:	\$10,000.00
		Purpose:	UIC Single Well Bond
Surety Bond	\$10,000.00	Liberty Mutual Insurance Company	ACT

Canceled

Cut Bank Gas Company Cut Bank MT	1770 B1	Canceled	2/27/2026
		Amount:	\$25,000.00
		Purpose:	Blanket Bond
Hamilton, John E. Miles City MT	193 G1	Canceled	2/24/2026
		Amount:	\$5,000.00
		Purpose:	Domestic Well Bond

Forfeited

Hesla Oil, LLC Kevin MT	734 G1	Forfeited	3/5/2026
		Amount:	\$1,500.00
		Purpose:	Single Well Bond
Hesla Oil, LLC Kevin MT	734 G3	Forfeited	3/5/2026
		Amount:	\$1,500.00
		Purpose:	Single Well Bond

Montana Board of Oil and Gas Conservation Summary of Bond Activity

2/11/2026 Through 4/7/2026

Forfeited

Hesla Oil, LLC Kevin MT	734 G4	Forfeited Amount: Purpose:	3/5/2026 \$1,500.00 Single Well Bond
Hesla Oil, LLC Kevin MT	734 G2	Forfeited Amount: Purpose:	3/5/2026 \$1,500.00 Single Well Bond
Hesla Oil, LLC Kevin MT	734 G8	Forfeited Amount: Purpose:	3/5/2026 \$1,500.00 Single Well Bond
Hesla Oil, LLC Kevin MT	734 G6	Forfeited Amount: Purpose:	3/5/2026 \$1,500.00 Single Well Bond
Hesla Oil, LLC Kevin MT	734 G9	Forfeited Amount: Purpose:	3/5/2026 \$1,500.00 Single Well Bond
Hesla Oil, LLC Kevin MT	734 G7	Forfeited Amount: Purpose:	3/5/2026 \$1,500.00 Single Well Bond
Hesla Oil, LLC Kevin MT	734 G5	Forfeited Amount: Purpose:	3/5/2026 \$1,500.00 Single Well Bond
Powder Battalion Holdings LLC Sheridan WY	829 M1	Forfeited Amount: Purpose:	3/20/2026 \$50,000.00 Multiple Well Bond

Forfeiture Ordered

McOil Montana One LLC Vancouver BC	427 G1	Forfeiture Ordered Amount: Purpose:	2/12/2026 \$1,500.00 Single Well Bond
Certificate of Deposit	\$1,500.00	1ST INTERSTATE BANK - CUT BANK	ACT
McOil Montana One LLC Vancouver BC	427 G3	Forfeiture Ordered Amount: Purpose:	2/12/2026 \$1,500.00 Single Well Bond
Certificate of Deposit	\$1,500.00	1ST INTERSTATE BANK - CUT BANK	ACT
McOil Montana One LLC Vancouver BC	427 G2	Forfeiture Ordered Amount: Purpose:	2/12/2026 \$1,500.00 Single Well Bond
Certificate of Deposit	\$1,500.00	1ST INTERSTATE BANK - CUT BANK	ACT

Montana Board of Oil and Gas Conservation Summary of Bond Activity

2/11/2026 Through 4/7/2026

Letter Sent

Hesla Oil, LLC Kevin MT	734 G1	Letter Sent Amount: Purpose:	2/23/2026 \$1,500.00 Single Well Bond
Hesla Oil, LLC Kevin MT	734 G9	Letter Sent Amount: Purpose:	2/23/2026 \$1,500.00 Single Well Bond
Hesla Oil, LLC Kevin MT	734 G5	Letter Sent Amount: Purpose:	2/23/2026 \$1,500.00 Single Well Bond
Hesla Oil, LLC Kevin MT	734 G8	Letter Sent Amount: Purpose:	2/23/2026 \$1,500.00 Single Well Bond
Hesla Oil, LLC Kevin MT	734 G3	Letter Sent Amount: Purpose:	2/23/2026 \$1,500.00 Single Well Bond
Hesla Oil, LLC Kevin MT	734 G7	Letter Sent Amount: Purpose:	2/23/2026 \$1,500.00 Single Well Bond
Hesla Oil, LLC Kevin MT	734 G4	Letter Sent Amount: Purpose:	2/23/2026 \$1,500.00 Single Well Bond
Hesla Oil, LLC Kevin MT	734 G6	Letter Sent Amount: Purpose:	2/23/2026 \$1,500.00 Single Well Bond
Hesla Oil, LLC Kevin MT	734 G2	Letter Sent Amount: Purpose:	2/23/2026 \$1,500.00 Single Well Bond
Powder Battalion Holdings LLC Sheridan WY	829 M1	Letter Sent Amount: Purpose:	2/23/2026 \$50,000.00 Multiple Well Bond

Released

True Oil LLC Casper WY	7840 V1	Released Amount: Purpose:	3/16/2026 \$95,000.00 UIC Blanket Bond
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Incident Report

Company	Responsibility	Date	Incident	Oil Released	Water Released	Source	Contained	Latitude	Longitude	County	T-R-S
MMGL MT I, LLC	BOG	2/11/2026	Spill or Release		30 Barrels	Flow Line - Injection	No	46.70115	-104.53094	Wibaux	11N-57E-15 SWSE
MMGL MT I, LLC	OTR	2/24/2026	Spill or Release		200 Barrels	Flow Line - Injection	No	46.34837	-104.17981	Fallon	7N-60E-22 SENE
Phoenix Operating LLC	OTR	3/4/2026	Spill or Release	25 Gallons		Flare Pit	No	48.21687	-104.26940	Roosevelt	29N-57E-35 SWSE
Continental Resources Inc	BOG	3/13/2026	Spill or Release	155 Barrels		Tank or Tank Battery	No	47.77489	-104.78922	Richland	23N-54E-9 NENE
White Rock Oil & Gas, LLC	OTR	3/18/2026	Spill or Release	40 Barrels		Flow Line - Production	No	47.78642	-104.28553	Richland	23N-58E-4 SENW

Docket Summary

4/9/2026 Hearing

214-2026	Continental Resources Inc	Hearing on Continental's application for permit to drill, Mitchell 1-1 H well, T25N-R56E: 1, 12, 13, 24; protest filed by Phoenix Operating LLC.	Withdrawn	Protest - 1/9/26 letter APD not approvable Permit withdrawn via email 3/24/26	<input type="checkbox"/>
215-2026	Continental Resources Inc	Hearing on Continental's application for permit to drill, Caruso 1-2H well, T25N-R56E: 2, 11, 14, 23; protest filed by Phoenix Operating LLC.	Withdrawn	Protest - 1/9/26 letter APD not approvable Permit withdrawn via email 3/24/26	<input type="checkbox"/>
216-2026	Continental Resources Inc	Hearing on Continental's application for permit to drill, Chet 1-3H well, T25N-R56E: 3, 10, 15, 22; protest filed by Phoenix Operating LLC.	Withdrawn	Protest - 1/9/26 letter APD not approvable Permit withdrawn via email 3/24/26	<input type="checkbox"/>
217-2026	Phoenix Operating LLC	Hearing on Phoenix 's application for permit to drill, Ex-Presidents 5-8-17-20-29 1H, Ex-Presidents 5-8-17-20-29 2H, Ex-Presidents 5-8-17-20-29 3H, and Ex-Presidents 5-8-17-20-29 4H wells, T25N-R56E: 5, 8, 17, 20, 29; protest filed by Continental Resources Inc.	Protested	Protest - 1/12/26 letter Dependent on dockets 312 & 313-2025 Phoenix permits received 12/24/25, latest ad ran 1/3/26	<input type="checkbox"/>
218-2026	Phoenix Operating LLC	Hearing on Phoenix 's application for permit to drill, Northman 6-7-18-19 1H, Northman 6-7-18-19 2H, Northman 6-7-18-19 3H, and Northman 6-7-18-19 4H wells, T28N-R56E: 6, 7, 18, 19; protest filed by Continental Resources Inc.	Protested	Protest - 1/12/26 letter TSU: order 341-2025, well density: order 342-2025 (Continental applications from 12/11/25) Related to docket 230-2026 (Phoenix protest of Continental APD) Phoenix APDs received 12/24/25 - latest ad ran 1/1/26 Continental APD received 2/6/26 - latest ad ran 1/29/26	<input type="checkbox"/>
219-2026	Phoenix Operating LLC	Hearing on Phoenix 's application for permit to drill, Augustus 15-22-27 1H, Augustus 15-22-27 2H, Augustus 15-22-27 3H, and Augustus 15-22-27 4H wells, T24N-R59E: 15, 22, 27; protest filed by Kraken Oil & Gas LLC.	Protested	Protest - 1/16/26 letter TSU: order 151-2024, well density: order 152-2024 (Kraken applications, extended TSU 12/11/25) Related to docket 226-2026 (Phoenix protest of Kraken APD) Phoenix APDs received 1/6/26 - latest ad ran 1/10/26 Kraken APD received 1/12/26 - latest ad ran 1/15/26	<input type="checkbox"/>
220-2026	Continental Resources Inc	Hearing on Continental's application for permit to drill, E. Poff Trust 13-12-1 1H well, T25N-R56E: 1, 12, 13; protest filed by Phoenix Operating LLC.	Dismissed	Protest - 1/18/26 letter Protest withdrawn via email received 3/27/26	<input type="checkbox"/>
221-2026	Phoenix Operating LLC	Hearing on Phoenix's application for permit to drill, Johnny Utah 30-19-18 1H, Johnny Utah 30-19-18 2H, Johnny Utah 30-19-18 3H, and Johnny Utah 30-19-18 4H wells, T26N-R56E: 18, 19, and 30; protest filed by Heritage Energy Operating, LLC.	Withdrawn	Protest - 1/20/26 letter No TSU till at least June Permits withdrawn via email received 3/27/26	<input type="checkbox"/>
222-2026	Phoenix Operating LLC	Hearing on Phoenix's application for permit to drill, Lepper Messiah 7-6-31-30 1HF, Lepper Messiah 7-6-31-30 2HF, Lepper Messiah 7-6-31-30 3HF, and Lepper Messiah 7-6-31-30 4HF wells, T26N-R56E: 6, 7 and T27N-R56E: 30, 31; protest filed by Heritage Energy Operating, LLC.	Withdrawn	Protest - 1/20/26 letter No TSU till at least June Phoenix APD's also protested by Continental in docket 227-2026 Permits withdrawn via email received 3/27/26	<input type="checkbox"/>

223-2026	Continental Resources Inc	Hearing on Continental's application for permit to drill, Whale 1-25H well, T28N-R55E: 25, 36 and T27N-R55E: 1, 12; protest filed by Phoenix Operating LLC.	Continued	Protest - 1/25/26 letter Dependent on dockets 198 & 199-2025 (Continental applications) Continental permit received 2/6/26, latest ad ran 1/29/26 Continued to June 2026, email received 4/2/26.	<input type="checkbox"/>
224-2026	Kraken Oil & Gas LLC	Hearing on Kraken's application for permit to drill in T24N-R59E-28, 33 and T23N-R59E-4; protest filed by Phoenix Operating LLC.	Dismissed	Protest - 1/25/26 letter TSU: order 114-2024, well density: order 115-2024 (Kraken applications, extended TSU 10/9/25) Kraken APD received 1/12/26 - latest ad ran 1/15/26 Protest withdrawn via email received 3/27/26	<input type="checkbox"/>
225-2026	Kraken Oil & Gas LLC	Hearing on Kraken's application for permit to drill in T24N-R59E-34 and T23N-R59E-3 & 10; protest filed by Phoenix Operating LLC.	Dismissed	Protest - 1/25/26 letter TSU: order 122-2024, well density: order 123-2024 (Kraken applications, extended TSU 10/9/2025) Kraken APD received 1/12/26 - latest ad ran 1/15/26 Protest withdrawn via email received 3/27/26	<input type="checkbox"/>
226-2026	Kraken Oil & Gas LLC	Hearing on Kraken's application for permit to drill in T24N-R59E-15, 22, & 27; protest filed by Phoenix Operating LLC.	Protested	Protest - 1/25/26 letter TSU: order 151-2024, well density: order 152-2024 (Kraken applications, extended TSU 12/11/25) Related to docket 219-2026 (Kraken protest of Phoenix APD) Phoenix APDs received 1/6/26 - latest ad ran 1/10/26 Kraken APD received 1/12/26 - latest ad ran 1/15/26	<input type="checkbox"/>
227-2026	Phoenix Operating LLC	Hearing on Phoenix's application for permit to drill, Lepper Messiah 7-6-31-30 1HF, Lepper Messiah 7-6-31-30 2HF, Lepper Messiah 7-6-31-30 3HF, and Lepper Messiah 7-6-31-30 4HF wells, T26N-R56E: 6, 7 and T27N-R56E: 30, 31; protest filed by Continental Resources Inc.	Withdrawn	Protest - 1/26/26 letter No TSU till at least June Phoenix APD's also protested by Heritage in docket 222-2026 Permits withdrawn via email received 3/27/26	<input type="checkbox"/>
228-2026	Continental Resources Inc	Hearing on Continental's application for permit to drill, Tiger 1-26H well, T28N-R55E: 26, 35 and T27N-R55E: 2, 11; protest filed by Phoenix Operating LLC.	Continued	Protest - 1/27/26 letter Dependent on dockets 196 & 197-2025 (Continental applications) Continental permit received 2/6/26, latest ad ran 1/24/26 Continued to June 2026, email received 4/2/26.	<input type="checkbox"/>
229-2026	Continental Resources Inc	Hearing on Continental's application for permit to drill, Nurse 1-27H well, T28N-R55E: 27, 34 and T27N-R55E: 3, 10; protest filed by Phoenix Operating LLC.	Continued	Protest - 1/27/26 letter Dependent on dockets 194 & 195-2025 (Continental applications) Continental permit received 2/12/26, latest ad ran 1/24/26 Continued to June 2026, email received 4/2/26.	<input type="checkbox"/>

230-2026	Continental Resources Inc	Hearing on Continental's application for permit to drill, Lemon 1-19H well, T28N-R56E: 6, 7, 18, 19; protest filed by Phoenix Operating LLC.	Protested	<i>Protest - 1/27/26 letter TSU: order 341-2025, well density: order 342-2025 (Continental applications from 12/11/25) Related to docket 218-2026 (Continental protest of Phoenix APD) Phoenix APDs received 12/24/25 - latest ad ran 1/1/26 Continental APD received 2/6/26 - latest ad ran 1/29/26</i>	<input type="checkbox"/>
231-2026	Phoenix Operating LLC	Hearing on Phoenix 's applications for permit to drill, Godfrey 20-19-24-23-22 1H, Godfrey 20-19-24-23-22 2H, Godfrey 20-19-24-23-22 3H, and Godfrey 20-19-24-23-22 4H wells, T23N-R59E: 22, 23, 24 and T23N-R60E:19, 20; protest filed by Kraken Oil & Gas LLC.	Protested	<i>Protest – 2/5/26 letter TSU: order 298-2025, well density: order 299-2025 (Kraken applications from 12/11/25) Phoenix APDs received 1/29/26 - latest ad ran 1/31/26</i>	<input type="checkbox"/>
232-2026	Phoenix Operating LLC	Hearing on Phoenix 's applications for permit to drill, Stellar 9-8-7 1H, Stellar 9-8-7 2H, Stellar 9-8-7 3H, and Stellar 9-8-7 4H wells, T23N-R59E: 7, 8, 9; protest filed by Kraken Oil & Gas LLC.	Protested	<i>Protest – 2/5/26 letter TSU: order 294-2025, well density: order 295-2025 (Kraken applications from 12/11/25) Phoenix APDs received 2/10/26 - latest ad ran 1/31/26</i>	<input type="checkbox"/>
233-2026	Phoenix Operating LLC	Hearing on Phoenix 's applications for permit to drill, Night 3-10-15 1H, Night 3-10-15 2H, Night 3-10-15 3H, and Night 3-10-15 4H wells, T29N-R57E: 3, 10, 15; protest filed by Black Dog Operating, LLC.	Continued	<i>Protest – 2/17/26 letter TSU: order 107-2025, well density: order 108-2025 (Black Dog applications from 4/10/25) Phoenix APDs received 2/9/26 - latest ad ran 2/12/26 (Helena only?) Continued to June 2026, email received 4/2/26.</i>	<input type="checkbox"/>
234-2026	Black Dog Operating, LLC	Hearing on Black Dog's applications for permit to drill, Hansen 34-27-22-1H, Hansen 34-27-22-2H, Hansen 34-27-22-3H, and Hansen 34-27-22-4H wells, T29N-R57E: 22, 27, 34; protest filed by Phoenix Operating LLC.	Continued	<i>Protest – 2/24/26 letter TSU: order 117-2025, well density: order 118-2025 (Black Dog applications from 4/10/25) Black Dog APDs received 2/17/26 - latest ad ran 2/14/26 Continued to June 2026, email received 4/2/26.</i>	<input type="checkbox"/>
235-2026	Phoenix Operating LLC	Hearing on Phoenix's applications for permit to drill, Captain 11-10-9-8 1H, Captain 11-10-9-8 2H, Captain 11-10-9-8 3H, and Captain 11-10-9-8 4H wells, T29N-R58E: 8, 9, 10, 11; protest filed by Oasis Petroleum North America LLC.	Protested	<i>Protest – 2/26/26 letter TSU: order 186-2025, well density: order 187-2025 (Oasis applications from 8/14/25) Phoenix APDs received 2/18/26 - latest ad ran 2/26/26 Oasis APDs received 3/2/26 - latest ad ran 3/19/26 (June docket?)</i>	<input type="checkbox"/>
236-2026	Phoenix Operating LLC	Hearing on Phoenix's applications for permit to drill, Major 2-3-4-5 1H, Major 2-3-4-5 2H, Major 2-3-4-5 3H, and Major 2-3-4-5 4H wells, T29N-R58E: 2, 3, 4, 5; protest filed by Oasis Petroleum North America LLC.	Protested	<i>Protest – 2/26/26 letter TSU: order 184-2025, well density: order 185-2025 (Oasis applications from 8/14/25) Phoenix APDs received 2/18/26 - latest ad ran 2/26/26 Oasis APDs received 3/2/26 - latest ad ran 3/19/26 (June docket?)</i>	<input type="checkbox"/>

237-2026	Phoenix Operating LLC	Hearing on Phoenix's application for permit to drill, Sable 14-23-26-35 1H, Sable 14-23-26-35 2H, Sable 14-23-26-35 3H, and Sable 14-23-26-35 4H wells, T27N-R55E: 14, 23, 26, 35; protest filed by Continental Resources Inc.	Continued	Protest – 3/2/26 letter Dependent on dockets 190 & 191-2025 (Continental applications) Phoenix permits received 2/18/26, latest ad ran 2/21/26 Continued to June 2026, email received 4/2/26.	<input type="checkbox"/>
238-2026	Phoenix Operating LLC	Hearing on Phoenix's application for permit to drill, Cactus Jack 15-22-27-34 1H, Cactus Jack 15-22-27-34 2H, Cactus Jack 15-22-27-34 3H, and Cactus Jack 15-22-27-34 4H wells, T27N-R55E: 15, 22, 27, 34; protest filed by Continental Resources Inc.	Continued	Protest – 3/2/26 letter Dependent on dockets 192 & 193-2025 (Continental applications) Phoenix permits received 2/18/26, latest ad ran 2/21/26 Continued to June 2026, email received 4/2/26.	<input type="checkbox"/>
239-2026	MorningStar Operating LLC	Horizontal tax certification for the following 4 wells: Frostbite Edith 6-15H (API # 083-22262), Frostbite Don 7-2H (API # 083-22089), Halvorsen State 21X-36 (API # 083-22363), & BR44X-1 (API # 083-21980).		Request to certify base decline rate for 4 wells that have been re-frac'd for a tax incentive.	<input type="checkbox"/>
240-2026	Avanti Helium US, Inc.	Flaring/ venting exception; Western Natural Gas 10-21 well, API 051-21846 and Western Natural Gas 11-22 well, API # 051-21843; Nisku Formation.			<input type="checkbox"/>
241-2026	White Rock Oil & Gas, LLC	Permanent spacing unit, Bakken/Three Forks Formation, 23N-57E-22: all, 23: all, 26: all, 27: all, 34: all, 35: all (Rocky West 1H).		TSU, Order 139-2025 Related applications, dockets 241, 242-2026	<input type="checkbox"/>
242-2026	White Rock Oil & Gas, LLC	Pooling, permanent spacing unit, Bakken/Three Forks Formation, 23N-57E-22: all, 23: all, 26: all, 27: all, 34: all, 35: all (Rocky West 1H).		Related applications, dockets 241, 242-2026	<input type="checkbox"/>
243-2026	White Rock Oil & Gas, LLC	Permanent spacing unit, Bakken/Three Forks Formation, 23N-57E-23: all, 26: all, 35: all (Rocky Infill 2H).		TSU, Order 137-2025 Related applications, dockets 243, 244-2026	<input type="checkbox"/>
244-2026	White Rock Oil & Gas, LLC	Pooling, permanent spacing unit, Bakken/Three Forks Formation, 23N-57E-23: all, 26: all, 35: all (Rocky Infill 2H).		Related applications, dockets 243, 244-2026	<input type="checkbox"/>
245-2026	White Rock Oil & Gas, LLC	Permanent spacing unit, Bakken/Three Forks Formation, 23N-57E-23: all, 24: all, 25: all, 26: all, 35: all, 36: all (Rocky East 3H).		TSU, Order 63-2025 Related applications, dockets 245, 246-2026	<input type="checkbox"/>
246-2026	White Rock Oil & Gas, LLC	Pooling, permanent spacing unit, Bakken/Three Forks Formation, 23N-57E-23: all, 24: all, 25: all, 26: all, 35: all, 36: all (Rocky East 3H). Non-consent penalties requested.		Related applications, dockets 245, 246-2026	<input type="checkbox"/>
247-2026	MorningStar Operating LLC	Designate overlapping temporary spacing unit, Bakken/Three Forks Formation, 24N-56E-16: all, 17: all, 20: all, 21: all, 28: all, 29: all, well at a location proximate to the common boundary between 24N-56E-16, 21, 28 and 24N-56E-17, 20, 29, 200' heel/toe setbacks. Apply for permanent spacing within 90 days of completion. The overlapping temporary spacing unit shall be limited to production from the proposed horizontal well with no allocation to portions of any existing spacing unit located outside of the proposed overlapping temporary spacing unit boundaries.		Section 17: PSU, 99-2002 Section 16: PSU, 40-2003 Section 28: PSU, 250-2003 Section 21: PSU, 305-2003 Sections 20 & 29: PSU, 50-2004 Sections 16 & 21: PSU, 139-2015; pooled, 140-2015	<input type="checkbox"/>

248-2026	MorningStar Operating LLC	<p>Designate overlapping temporary spacing unit, Bakken/Three Forks Formation, 25N-55E-30, 31, 200' heel/toe setbacks and 660' lateral setbacks. Apply for permanent spacing within 90 days of completion.</p> <p>Amend Order 15-2005 to clarify that said order is limited to the Doright-Vaira 30-2H and Doright-Betty 30-4H wells.</p> <p>Amend Order 187-2002 to clarify that said order is limited to the Burning Tree-Jessie 31-3-HID3, Burning Tree-Luren 31-4H, and Burning Tree-Julson 31-16-H wells.</p>		<p>Section 31: PSU, 187-2002 Section 30: PSU, 15-2005; Well density for third, undrilled well, 314-2008 (need to vacate?)</p>	<input type="checkbox"/>
249-2026	MorningStar Operating LLC	<p>Designate overlapping temporary spacing unit, Bakken/Three Forks Formation, 25N-55E-29: all, 30: all, 31: all, 32: all, well at a location proximate to the common boundary between 25N-55E-29, 32 and 25N-55E-30, 31, 200' heel/toe setbacks. Apply for permanent spacing within 90 days of completion. The overlapping temporary spacing unit shall be limited to production from the proposed horizontal well with no allocation to portions of any existing spacing unit located outside of the proposed overlapping temporary spacing unit boundaries.</p>	Withdrawn	<p>OSTU previously existed and was vacated as condition of approval for order 356-2014. Section 31: PSU, 187-2002 Section 30: PSU, 15-2005 (three wells authorized, two wells drilled) Section 29 & 32: PSU, 378-2004 (three wells authorized, two wells drilled) Withdrawn via email received 3/26/2026</p>	<input type="checkbox"/>
250-2026	Whiting Oil and Gas Corporation	<p>Designate overlapping temporary spacing unit, Bakken/Three Forks Formation, 25N-57E-1: all, 2: all, 3: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion.</p> <p>Amend Order 17-2014 to clarify that said order is limited to the Iversen Bros. 31-1-1H well. Amend Order 333-2013 to clarify that said order is limited to the Sundheim 31-2-1H well. Amend Order 159-2012 to clarify that said order is limited to the Barter 21-3H well.</p> <p>Vacating Orders 18-2014 (drill up to three additional Bkn/TF wells, PSU, 25N-57E-1: all, 12: all), Order 334-2013 (drill up to three additional Bkn/TF wells, PSU, 25N-57E-2: all, 11: all), and Order 160-2012 (drill up to three additional wells, Bkn/TF wells, PSU, 25N-57E-3: all, 10: all).</p>		<p>Related applications, dockets 250, 251-2026 Sections 1 & 12: PSU, 16-2014; pooling, 17-2014; well density, 18-2014 Sections 2 & 11: PSU, 332-2013; pooling, 333-2013; well density, 334-2013 Sections 3 & 10: PSU, 158-2012; pooling, 159-2012; well density, 160-2012</p>	<input type="checkbox"/>
251-2026	Whiting Oil and Gas Corporation	<p>Authorize the drilling of three additional horizontal wells, overlapping temporary spacing unit, Bakken/Three Forks Formation, 25N-57E-1: all, 2: all, 3: all, 200' heel/toe setbacks and 500' lateral setbacks.</p>		<p>Related applications, dockets 250, 251-2026</p>	<input type="checkbox"/>

252-2026	Whiting Oil and Gas Corporation	<p>Designate overlapping temporary spacing unit, Bakken/Three Forks Formation, 25N-57E-10: all, 11: all, 12: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion.</p> <p>Amend Order 17-2014 to clarify that said order is limited to the Iversen Bros. 31-1-1H well. Amend Order 333-2013 to clarify that said order is limited to the Sundheim 31-2-1H well. Amend Order 159-2012 to clarify that said order is limited to the Barter 21-3H well.</p> <p>Vacating Orders 18-2014 (drill up to three additional Bkn/TF wells, PSU, 25N-57E-1: all, 12: all), Order 334-2013 (drill up to three additional Bkn/TF wells, PSU, 25N-57E-2: all, 11: all), and Order 160-2012 (drill up to three additional wells, Bkn/TF wells, PSU, 25N-57E-3: all, 10: all).</p>	<p><i>Related applications, dockets 252, 253 2026 Sections 1 & 12: PSU, 16-2014; pooling, 17-2014; well density, 18-2014 Sections 2 & 11: PSU, 332-2013; pooling, 333-2013; well density, 334-2013 Sections 3 & 10: PSU, 158-2012; pooling, 159-2012; well density, 160-2012</i></p>	<input type="checkbox"/>
253-2026	Whiting Oil and Gas Corporation	<p>Authorize the drilling of three additional horizontal wells, overlapping temporary spacing unit, Bakken/Three Forks Formation, 25N-57E-10: all, 11: all, 12: all, 200' heel/toe setbacks and 500' lateral setbacks.</p>	<p><i>Related applications, dockets 252, 253-2026</i></p>	<input type="checkbox"/>
254-2026	Whiting Oil and Gas Corporation	<p>Designate overlapping temporary spacing unit, Bakken/Three Forks Formation, 25N-57E-15: all, 16: all, 17: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion.</p> <p>Amend Order 570-2012 to clarify that said order is limited to the Kilen 21-15-1H well. Amend Order 20-2013 to clarify that said order is limited to the Norby 21-16-1H well. Amend Order 163-2013 to clarify that said order is limited to the Vitt 31-17-1H well.</p> <p>Vacate Orders 571-2012 (drill up to three additional wells, PSU, Bkn/TF Formation, 25N-57E-15: all, 22: all), Order 21-2013 (drill up to three additional wells, PSU, Bkn/TF Formation, 25N-57E-16: all, 21: all), and Order 164-2013 (drill up to three additional wells, PSU, Bkn/TF Formation, 25N-57E-17: all, 20: all).</p>	<p><i>Related applications, dockets 254, 255-2026 Sections 15 & 22: PSU, 569-2012; pooling, 570-2012; well density, 571-2012 Sections 16 & 21: PSU, 19-2013; pooling, 20-2013; well density, 21-2013 Sections 17 & 20: PSU, 162-2013; pooling, 163-2013; well density, 164-2013</i></p>	<input type="checkbox"/>
255-2026	Whiting Oil and Gas Corporation	<p>Authorize the drilling of three additional horizontal wells, overlapping temporary spacing unit, Bakken/Three Forks Formation, 25N-57E-15: all, 16: all, 17: all, 200' heel/toe setbacks and 500' lateral setbacks.</p>	<p><i>Related applications, dockets 254, 255-2026</i></p>	<input type="checkbox"/>

256-2026	Whiting Oil and Gas Corporation	<p>Designate overlapping temporary spacing unit, Bakken/Three Forks Formation, 25N-57E-20: all, 21: all, 22: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion.</p> <p>Amend Order 570-2012 to clarify that said order is limited to the Kilen 21-15-1H well. Amend Order 20-2013 to clarify that said order is limited to the Norby 21-16-1H well. Amend Order 163-2013 to clarify that said order is limited to the Vitt 31-17-1H well.</p> <p>Vacate Orders 571-2012 (drill up to three additional wells, PSU, Bkn/TF Formation, 25N-57E-15: all, 22: all), Order 21-2013 (drill up to three additional wells, PSU, Bkn/TF Formation, 25N-57E-16: all, 21: all), and Order 164-2013 (drill up to three additional wells, PSU, Bkn/TF Formation, 25N-57E-17: all, 20: all).</p>	<p><i>Related applications, dockets 256, 257-2026 Sections 15 & 22: PSU, 569-2012; pooling, 570-2012; well density, 571-2012 Sections 16 & 21: PSU, 19-2013; pooling, 20-2013; well density, 21-2013 Sections 17 & 20: PSU, 162-2013; pooling, 163-2013; well density, 164-2013</i></p>	<input type="checkbox"/>
257-2026	Whiting Oil and Gas Corporation	<p>Authorize the drilling of three additional horizontal wells, overlapping temporary spacing unit, Bakken/Three Forks Formation, 25N-57E-20: all, 21: all, 22: all, 200' heel/toe setbacks and 500' lateral setbacks.</p>	<p><i>Related applications, dockets 256, 257-2026</i></p>	<input type="checkbox"/>
258-2026	Whiting Oil and Gas Corporation	<p>Designate overlapping temporary spacing unit, Bakken/Three Forks Formation, 25N-58E-5: all, 8: all, 17: all, 20: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion.</p> <p>Amend Order 326-2012 to clarify that said order is limited to the Kittleson 24-8TFH well. Amend Order 420-2013 to clarify that said order is limited to the Sundheim 44-8-3H well. Amend Order 258-2013 to clarify that said order is limited to the Sundheim 31-17-1H well.</p> <p>Amend Order 327-2012 (drill up to three additional Bkn/TF wells (4 total) in the PSU, 25N-58E-5: all, and 8: all) to allow only one additional well in the PSU.</p> <p>Vacate Order 259-2013 (drill up to three additional wells, PSU, Bkn/TF Formation, 25N-58E-17: all, 20: all).</p>	<p><i>Related applications, dockets 258, 259-2026 Sections 5 & 8: PSU, 325-2012; pooling, 326-2012 & 420-2013; well density, 327-2012 Sections 17 & 20: PSU, 257-2013; pooling, 258-2013; well density, 259-2013</i></p>	<input type="checkbox"/>
259-2026	Whiting Oil and Gas Corporation	<p>Authorize the drilling of three additional horizontal wells, overlapping temporary spacing unit, Bakken/Three Forks Formation, 25N-58E-5: all, 8: all, 17: all, 20: all, 200' heel/toe setbacks and 500' lateral setbacks.</p>	<p><i>Related applications, dockets 258, 259-2026</i></p>	<input type="checkbox"/>

260-2026	Whiting Oil and Gas Corporation	<p>Designate overlapping temporary spacing unit, Bakken/Three Forks Formation, 26N-57E-14: all, 23: all, 26: all, 35: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion.</p> <p>Amend Order 29-2013 to clarify that said order is limited to the Kittleson Federal 34-23-1H well. Amend Order 166-2013 to clarify that said order is limited to the Sundheim Federal 24-35-1H well.</p> <p>Vacate Orders 30-2013 (drill up to three additional wells, PSU, Bkn/TF Formation, 26N-57E-14: all, 23: all) and Order 167-2013 (drill up to three additional wells, PSU, Bkn/TF Formation, 26N-57E-26: all, 35: all).</p>	<p><i>Related applications, dockets 260, 261-2026 Sections 14 & 23: PSU, 28-2013; pooling, 29-2013; well density, 30-2013 Sections 26 & 35: PSU, 165-2013; pooling, 166-2013; well density, 167-2013</i></p>	<input type="checkbox"/>
261-2026	Whiting Oil and Gas Corporation	<p>Authorize the drilling of three additional horizontal wells, overlapping temporary spacing unit, Bakken/Three Forks Formation, 26N-57E-14: all, 23: all, 26: all, 35: all, 200' heel/toe setbacks and 500' lateral setbacks.</p>	<p><i>Related applications, dockets 260, 261-2026</i></p>	<input type="checkbox"/>
262-2026	Oasis Petroleum North America LLC	<p>Designate overlapping temporary spacing unit, Bakken/Three Forks Formation, 29N-58E-13: all, 24: all, 25: all, 36: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion.</p> <p>Amend Order 221-2013 to clarify that said order is limited to the B&RT2958 13-25H well. Amend Order 91-2015 to clarify that said order is limited to the Dave T #2958 13-25H well.</p> <p>Vacate Orders 222-2013 (drill up to four additional wells, PSU, Bkn/TF Formation, 29N-58E-13: all, 24: all) and Order 226-2013 (drill up to four additional wells, PSU, Bkn/TF Formation, 29N-58E-25: all, 36: all).</p>	<p><i>Related applications, dockets 262, 263-2026 Sections 13 & 24: PSU, 221-2013; well density, 222-2013 Sections 25 & 36: PSU, 225-2013; pooling, 91-2015; well density, 226-2013</i></p>	<input type="checkbox"/>
263-2026	Oasis Petroleum North America LLC	<p>Authorize the drilling of three additional horizontal wells, overlapping temporary spacing unit, Bakken/Three Forks Formation, 29N-58E-13: all, 24: all, 25: all, 36: all, 200' heel/toe setbacks and 500' lateral setbacks.</p>	<p><i>Related applications, dockets 262, 263-2026</i></p>	<input type="checkbox"/>
264-2026	Oasis Petroleum North America LLC	<p>Designate overlapping temporary spacing unit, Bakken/Three Forks Formation, 29N-58E-13: all, 24: all, 25: all, 36: all and 29N-59E-18: all, 19: all, 30: all, 31: all, well at a location proximate to the common boundary between 29N-58E-13, 24, 25, 36 and 29N-59E-18, 19, 30, 31, 200' heel/toe setbacks. Apply for permanent spacing within 90 days of completion. The overlapping temporary spacing unit shall be limited to production from the proposed horizontal well with no allocation to portions of any existing spacing unit located outside of the proposed overlapping temporary spacing unit boundaries.</p>	<p><i>Sections 13 & 24: PSU, 221-2013; well density, 222-2013 Sections 25 & 36: PSU, 225-2013; pooling, 91-2015; well density, 226-2013 Sections 30 & 31: PSU, 227-2013; pooling, 69-2015 Sections 18, 19, 30, & 31: OSTU, 182-2025</i></p>	<input type="checkbox"/>

265-2026	Continental Resources Inc	<p>Designate overlapping temporary spacing unit, Bakken/Three Forks Formation, 26N-55E-4: all, 9: all, 16: all, 21: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion. The overlapping temporary spacing unit shall be limited to the production from the proposed horizontal well. The 500' lateral setback authorization is only valid from one year of the date of the order. If no well is drilled and the 500' lateral setback is not renewed prior to the expiration of one year, the lateral setback for the first well in this unit shall be 1320' from the side boundaries.</p> <p>Amend Order 118-2013 to clarify that said order is limited to the Cara 1-21H well.</p> <p>Vacate Order 436-2005 (TSU, Bakken, 26N-55E-4: all and 9: all)</p>	Continued	<p><i>Related applications, dockets 265, 266-2026</i> <i>Conflicts with Phoenix dockets 146 & 147-2026</i> <i>Sections 4 & 9: TSU, 436-2005</i> <i>Sections 16 & 21: PSU, 118-2013</i> <i>Continued to June 2026, email received 4/2/26.</i></p>	<input type="checkbox"/>
266-2026	Continental Resources Inc	<p>Authorize the drilling of three additional horizontal wells, overlapping temporary spacing unit, Bakken/Three Forks Formation, 26N-55E-4: all, 9: all, 16: all, 21: all, 200' heel/toe setbacks and 500' lateral setbacks.</p>	Continued	<p><i>Related applications, dockets 265, 266-2026</i> <i>Continued to June 2026, email received 4/2/26.</i></p>	<input type="checkbox"/>
267-2026	Continental Resources Inc	<p>Designate overlapping temporary spacing unit, Bakken/Three Forks Formation, 26N-55E-5: all, 8: all, 17: all, 20: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion. The overlapping temporary spacing unit shall be limited to the production from the proposed horizontal well. The 500' lateral setback authorization is only valid from one year of the date of the order. If no well is drilled and the 500' lateral setback is not renewed prior to the expiration of one year, the lateral setback for the first well in this unit shall be 1320' from the side boundaries.</p> <p>Amend Order 469-2012 to clarify that said order is limited to the Wagner 1-17H well.</p> <p>Vacate Order 356-2011 (TSU, Bkn/TF Formations, 26N-55E-5: all, 8: all).</p> <p>Vacate Order 470-2012 (drill up to three additional wells, PSU, Bkn/TF Formation, 26N-55E-17: all, 20: all).</p>		<p><i>Related applications, dockets 267, 268-2026</i> <i>Sections 5 & 8: TSU, 356-2011</i> <i>Sections 17 & 20: PSU, 468-2012; pooling, 469-2012; well density, order 470-2012</i></p>	<input type="checkbox"/>
268-2026	Continental Resources Inc	<p>Authorize the drilling of three additional horizontal wells, overlapping temporary spacing unit, Bakken/Three Forks Formation, 26N-55E-5: all, 8: all, 17: all, 20: all, 200' heel/toe setbacks and 500' lateral setbacks.</p>		<p><i>Related applications, dockets 267, 268-2026</i></p>	<input type="checkbox"/>

269-2026	Continental Resources Inc	<p>Designate overlapping temporary spacing unit, Bakken/Three Forks Formation, 26N-55E-6: all, 7: all, 18: all, 19: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion. The overlapping temporary spacing unit shall be limited to the production from the proposed horizontal well. The 500' lateral setback authorization is only valid from one year of the date of the order. If no well is drilled and the 500' lateral setback is not renewed prior to the expiration of one year, the lateral setback for the first well in this unit shall be 1320' from the side boundaries.</p> <p>Amend Order 128-2012 to clarify that said order is limited to the Peterson 1-18H well.</p> <p>Vacate Order 113-2006 (TSU, Bkn, 26N-55E-6: all and 7: all). Vacate Order 137-2012 (drill up to three additional wells, Bkn/TF Formation, PSU, 26N-55E-18: all, 19: all).</p>	<p><i>Related applications, dockets 269, 270-2026 Sections 6 & 7: TSU, 113-2006 Sections 18 & 19: PSU, 122-2012; pooling, 128-2012; well density, order 137-2012</i></p>	<input type="checkbox"/>	
270-2026	Continental Resources Inc	<p>Authorize the drilling of three additional horizontal wells, overlapping temporary spacing unit, Bakken/Three Forks Formation, 26N-55E-6: all, 7: all, 18: all, 19: all, 200' heel/toe setbacks and 500' lateral setbacks.</p>	<p><i>Related applications, dockets 269, 270-2026</i></p>	<input type="checkbox"/>	
271-2026	Continental Resources Inc	<p>Designate overlapping temporary spacing unit, Bakken/Three Forks Formation, 26N-55E-26: all, 35: all and 25N-55E-2: all, 11: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion. The overlapping temporary spacing unit shall be limited to the production from the proposed horizontal well. The 500' lateral setback authorization is only valid from one year of the date of the order. If no well is drilled and the 500' lateral setback is not renewed prior to the expiration of one year, the lateral setback for the first well in this unit shall be 1320' from the side boundaries.</p> <p>Amend Order 436-2011 to clarify that said order is limited to the Cochrane 1-11H well.</p> <p>Vacate Order 130-2012 (drill up to three additional wells, Bkn/TF Formation, PSU, 25N-55E-2: all, 11: all)</p>	Continued	<p><i>Related applications, dockets 271, 272-2026 Conflicts with Phoenix dockets 316 & 317-2026 Sections 2 & 11: PSU, 435-2011; pooling, 436-2011; well density, order 130-2012 Continued to June 2026, email received 4/2/26.</i></p>	<input type="checkbox"/>
272-2026	Continental Resources Inc	<p>Authorize the drilling of three additional horizontal wells, overlapping temporary spacing unit, Bakken/Three Forks Formation, 26N-55E-26: all, 35: all and 25N-55E-2: all, 11: all, 200' heel/toe setbacks and 500' lateral setbacks.</p>	Continued	<p><i>Related applications, dockets 271, 272-2026 Continued to June 2026, email received 4/2/26.</i></p>	<input type="checkbox"/>

273-2026	Continental Resources Inc	<p>Designate overlapping temporary spacing unit, Bakken/Three Forks Formation, 26N-55E-27: all, 34: all and 25N-55E-3: all, 10: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion. The overlapping temporary spacing unit shall be limited to the production from the proposed horizontal well. The 500' lateral setback authorization is only valid from one year of the date of the order. If no well is drilled and the 500' lateral setback is not renewed prior to the expiration of one year, the lateral setback for the first well in this unit shall be 1320' from the side boundaries.</p> <p>Amend Order 346-2012 to clarify that said order is limited to the Sharon 1-3H well. Amend Order 124-2006 to clarify that said order is limited to the Katherine 1-15H and Katherine 2-15H wells.</p> <p>Amend Order 429-2011 (Amend Order 130-2006 to allow 200' heel/toe and 500' lateral setback in PSU, 25N-55E-10: all, 15: all and allow up to four Bakken/Three Forks Formation wells) to authorize two additional wells in that spacing unit.</p> <p>Vacate Order 345-2012 (drill three additional (4 total) wells in spacing unit comprised of 25N-55E-3: all, and 26N-55E-34: all).</p>	Continued	<p><i>Related applications, dockets 273, 274-2026</i> <i>Conflicts with Phoenix dockets 152 & 153-2026</i> <i>Sections 3 & 34: PSU, 344-2012; pooling, 346-2012; well density, order 345-2012</i> <i>Sections 10 & 15: PSU, 124-2006; well density, order 130-2006 & 429-2011</i> <i>Proposed TSU splits PSU of 10 & 15 in half, which could effect correlative rights of section 15</i> <i>Continued to June 2026, email received 4/2/26.</i></p>	<input type="checkbox"/>
274-2026	Continental Resources Inc	<p>Authorize the drilling of three additional horizontal wells, overlapping temporary spacing unit, Bakken/Three Forks Formation, 26N-55E-27: all, 34: all and 25N-55E-3: all, 10: all, 200' heel/toe setbacks and 500' lateral setbacks.</p>	Continued	<p><i>Related applications, dockets 273, 274-2026</i> <i>Continued to June 2026, email received 4/2/26.</i></p>	<input type="checkbox"/>
275-2026	Continental Resources Inc	<p>Designate overlapping temporary spacing unit, Bakken/Three Forks Formation, 25N-56E-22: all, 23: all, 24: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion. The overlapping temporary spacing unit shall be limited to the production from the proposed horizontal well. The 500' lateral setback authorization is only valid from one year of the date of the order. If no well is drilled and the 500' lateral setback is not renewed prior to the expiration of one year, the lateral setback for the first well in this unit shall be 1320' from the side boundaries.</p> <p>Amend Order 552-2012 to clarify that said order is limited to the Lone Butte Patricia 24-25-1H well.</p> <p>Vacate Order 553-2012 (drill up to three additional wells, PSU, Bkn/TF Formation, 25N-56E-24: all, 25: all).</p>	Protested	<p><i>Related applications, dockets 275, 276-2026</i> <i>Conflicts with Phoenix dockets 279, 280, 283, & 284-2026</i> <i>Sections 24 & 25: PSU, 551-2012; pooling, 552-2012; well density, order 553-2012 (splits PSU in half with docket 277-2026)</i> <i>Protested by Phoenix, email received 4/7/2026.</i></p>	<input type="checkbox"/>
276-2026	Continental Resources Inc	<p>Authorize the drilling of three additional horizontal wells, overlapping temporary spacing unit, Bakken/Three Forks Formation, 25N-56E-22: all, 23: all, 24: all, 200' heel/toe setbacks and 500' lateral setbacks.</p>	Protested	<p><i>Related applications, dockets 275, 276-2026</i> <i>Protested by Phoenix, email received 4/7/2026.</i></p>	<input type="checkbox"/>

277-2026	Continental Resources Inc	<p>Designate overlapping temporary spacing unit, Bakken/Three Forks Formation, 25N-56E-25: all, 26: all, 27: all, 28: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion. The overlapping temporary spacing unit shall be limited to the production from the proposed horizontal well. The 500' lateral setback authorization is only valid from one year of the date of the order. If no well is drilled and the 500' lateral setback is not renewed prior to the expiration of one year, the lateral setback for the first well in this unit shall be 1320' from the side boundaries.</p> <p>Amend Order 552-2012 to clarify that said order is limited to the Lone Butte Patricia 24-25-1H well.</p> <p>Vacate Order 553-2012 (drill up to three additional wells, PSU, Bkn/TF Formation, 25N-56E-24: all, 25: all).</p>	Protostod	<p>Related applications, dockets 277, 278 2026 Conflicts with Phoenix dockets 279, 280, 283, 284, 285, & 286-2026 Sections 24 & 25: PSU, 551-2012; pooling, 552-2012; well density, order 553-2012 (splits PSU in half with docket 275-2026) Protested by Phoenix, email received 4/7/2026.</p>	<input type="checkbox"/>
278-2026	Continental Resources Inc	<p>Authorize the drilling of three additional horizontal wells, overlapping temporary spacing unit, Bakken/Three Forks Formation, 25N-56E-25: all, 26: all, 27: all, 28: all, 200' heel/toe setbacks and 500' lateral setbacks.</p>	Protested	<p>Related applications, dockets 277, 278-2026 Protested by Phoenix, email received 4/7/2026.</p>	<input type="checkbox"/>
279-2026	Phoenix Operating LLC	<p>Designate temporary spacing unit, Bakken/Three Forks Formation, 25N-56E-23: all, 26: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion. Operations must commence within one year of date of order.</p> <p>Vacate Order 380-2011 (pertaining only to 25N-56E-23: all, 26: all), Order 235-2012 (Amend setbacks in Order 380-2011, TSU, 25N-56E-23: all, 26: all)</p>	Protested	<p>Already TSU under 380-2011, need for setbacks Conflicts with Continental dockets 275 to 278-2026 Related applications, dockets 279, 280-2026 Protested by Continental, email received 4/6/2026.</p>	<input type="checkbox"/>
280-2026	Phoenix Operating LLC	<p>Authorize the drilling of three additional horizontal wells, temporary spacing unit, Bakken/Three Forks Formation, 25N-56E-23: all, 26: all, 200' heel/toe setbacks and 500' lateral setbacks.</p>	Protested	<p>Related applications, dockets 279, 280-2026 Protested by Continental, email received 4/6/2026.</p>	<input type="checkbox"/>
281-2026	Phoenix Operating LLC	<p>Designate temporary spacing unit, Bakken/Three Forks Formation, 24N-58E-27: all, 34: all and 23N-58E-3: all, 10: all, 15:N/2, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion. Operations must commence within one year of date of order.</p> <p>Vacate Order 60-2007 (PSU, Bkn Formation, 23N-58E-10: all (Velma 1-10H), Order 93-2010 (TSU, Bkn Formation, 24N-58E-27: all, 34: all), Order 163-2012 (Amend setbacks in Order 93-2010, TSU, 24N-58E-27: all, 34: all).</p>		<p>Related applications, dockets 281, 282-2026 Added in N/2 of section 15 that is currently unspaced for the Bakken/Three Forks to prevent orphaning those tracts.</p>	<input type="checkbox"/>
282-2026	Phoenix Operating LLC	<p>Authorize the drilling of three additional horizontal wells, temporary spacing unit, Bakken/Three Forks Formation, 24N-58E-27: all, 34: all and 23N-58E-3: all, 10: all, 15:N/2, 200' heel/toe setbacks and 500' lateral setbacks.</p>		<p>Related applications, dockets 281, 282-2026</p>	<input type="checkbox"/>

283-2026	Phoenix Operating LLC	Designate temporary spacing unit, Bakken/Three Forks Formation, 25N-56E-22: all, 27: all, 34: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion. Operations must commence within one year of date of order. Vacate Order 380-2011 (pertaining only to 25N-56E-22: all, 27: all, 34: all).	Protested	<i>Conflicts with Continental dockets 275 to 278-2026 Related applications, dockets 283, 284-2026 Protested by Continental, email received 4/6/2026.</i>	<input type="checkbox"/>
284-2026	Phoenix Operating LLC	Authorize the drilling of three additional horizontal wells, temporary spacing unit, Bakken/Three Forks Formation, 25N-56E-22: all, 27: all, 34: all, 200' heel/toe setbacks and 500' lateral setbacks.	Protested	<i>Related applications, dockets 283, 284-2026 Protested by Continental, email received 4/6/2026.</i>	<input type="checkbox"/>
285-2026	Phoenix Operating LLC	Designate temporary spacing unit, Bakken/Three Forks Formation, 25N-56E-28: all, 33: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion. Operations must commence within one year of date of order. Vacate Order 380-2011 (pertaining only to 25N-56E-28: all, 33: all).	Protested	<i>Already TSU under 380-2011, need for setbacks Conflicts with Continental dockets 277 to 278-2026 Related applications, dockets 285, 286-2026 Protested by Continental, email received 4/6/2026.</i>	<input type="checkbox"/>
286-2026	Phoenix Operating LLC	Authorize the drilling of three additional horizontal wells, temporary spacing unit, Bakken/Three Forks Formation, 25N-56E-28: all, 33: all, 200' heel/toe setbacks and 500' lateral setbacks.	Protested	<i>Related applications, dockets 285, 286-2026 Protested by Continental, email received 4/6/2026.</i>	<input type="checkbox"/>
287-2026	Phoenix Operating LLC	Designate temporary spacing unit, Bakken/Three Forks Formation, 23N-60E-30: all, 31: all and 22N-60E-6: all, 7: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion. Operations must commence within one year of date of order. Vacate Order 106-2008 (PSU, Bkn Formation, 22N-60E-6: all, 7: all (Olson 11X-7)), Order 12-2010 (Well density, Bkn Formation, 22N-60E-6: all, 7: all), and Order 380-2011 (pertaining only to 23N-60E-30: all, 31: all).	Continued	<i>Bakken well subject to PSU established by order 106-2008 plugged in 2016 Related applications, dockets 287, 288-2026 Continued to June 2026, email received 4/3/26.</i>	<input type="checkbox"/>
288-2026	Phoenix Operating LLC	Authorize the drilling of three additional horizontal wells, temporary spacing unit, Bakken/Three Forks Formation, 23N-60E-30: all, 31: all and 22N-60E-6: all, 7: all, 200' heel/toe setbacks and 500' lateral setbacks.	Continued	<i>Related applications, dockets 287, 288-2026 Continued to June 2026, email received 4/3/26.</i>	<input type="checkbox"/>

289-2026 Kraken Oil & Gas LLC

Amend Order 87-2025 (Designate OTSU, Bkn/TF Formation, 28N-58E-1: all, 2: all, 3: all, 4: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion. Operations must commence within one year of date of order. The overlapping temporary spacing unit shall be limited to the production from the proposed horizontal well. Amend Order 184-2012 to clarify that said order is limited to the Crusch 12-1 #1H well. Vacate Orders 186-2012 (drill up to four Bkn/TF Formation wells in spacing unit comprised of 28N-58E-1: all, 12: all), Order 48-2023 (OTSU, Bkn/TF Formation, 28N-58E-1: all, 2: all, 11: all, 12: all, 200' heel/toe setbacks, well at a location proximate to the common boundary between the TSU 28N-58E-2, 11, and PSU 28N-58E-1, 12), Order 153-2010 (Create two temporary spacing units, Bkn Formation, 28N-58E-2: all, 11: all and 28N-58E-14: all, 23: all. To drill one well per spacing unit utilizing one common pad, 660 setback with heel to be located no closer than 200' to the common spacing unit boundary. (Amend Orders 42-2010 and 44-2010). [AMENDED BY ORDER 48-2011 TO 660' SIDE AND 200' TOE AND HEEL SETBACK.]), Order 48-2011 (Amend Order 42-2010 and 153-2010, Bakken Formation, 28N-58E-2: all, 11: all, allow 660' east/west, 200' north/south setbacks), Order 115-2011 (TSU, Bkn/TF Formation, 28N-58E-3: all, 10: all), and Order 15-2011 (TSU, Bkn/TF Formation, 28N-58E-4: all, 9: all). Amend that operations must commence not later than the date of the Board's regularly-scheduled April 2027 hearing.

Original OTSU order issued 4/10/2025, request extension of operations commence date to April 2027 hearing.

290-2026 Kraken Oil & Gas LLC
45-2026 F

Amend Order 89-2025 (Designate OTSU, Bkn/TF Formation, 28N-58E-9: all, 10: all, 11: all, 12: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion. Operations must commence within one year of date of order. The overlapping temporary spacing unit shall be limited to the production from the proposed horizontal well. Amend Order 184-2012 to clarify that said order is limited to the Crusch 12-1 #1H well. Vacate Orders 186-2012 (drill up to four Bkn/TF Formation wells in spacing unit comprised of 28N-58E-1: all, 12: all), Order 48-2023 (OTSU, Bkn/TF Formation, 28N-58E-1: all, 2: all, 11: all, 12: all, 200' heel/toe setbacks, well at a location proximate to the common boundary between the TSU 28N-58E-2, 11, and PSU 28N-58E-1, 12), Order 153-2010 (Create two temporary spacing units, Bkn Formation, 28N-58E-2: all, 11: all and 28N-58E-14: all, 23: all. To drill one well per spacing unit utilizing one common pad, 660 setback with heel to be located no closer than 200' to the common spacing unit boundary. (Amend Orders 42-2010 and 44-2010). [AMENDED BY ORDER 48-2011 TO 660' SIDE AND 200' TOE AND HEEL SETBACK.]), Order 48-2011 (Amend Order 42-2010 and 153-2010, Bakken Formation, 28N-58E-2: all, 11: all, allow 660' east/west, 200' north/south setbacks), Order 115-2011 (TSU, Bkn/TF Formation, 28N-58E-3: all, 10: all), and Order 15-2011 (TSU, Bkn/TF Formation, 28N-58E-4: all, 9: all). Amend that operations must commence not later than the date of the Board's regularly-scheduled April 2027 hearing.

Original OTSU order issued 4/10/2025, request extension of operations commence date to April 2027 hearing.

291-2026 Kraken Oil & Gas LLC	Amend Order 83-2025 (Designate OTSU, Bkn/TF Formation, 28N-57E-1: all and 28N-58E-5: all, 6: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion. Operations must commence within one year of date of order. The overlapping temporary spacing unit shall be limited to the production from the proposed horizontal well. Amend Order 310-2014 to clarify that said order is limited to the Snyder 1-12 #1H well. Vacate Order 311-2014 (Authorization to drill up to four wells, PSU, Bkn/TF Formation, 28N-57E-1: all, 12: all). Amend that operations must commence not later than the date of the Board's regularly-scheduled April 2027 hearing.	<i>Original OTSU order issued 4/10/2025, request extension of operations commence date to April 2027 hearing.</i> <input type="checkbox"/>
292-2026 Kraken Oil & Gas LLC 46-2026 F	Amend Order 85-2025 (Designate OTSU, Bkn/TF Formation, 28N-57E-12: all and 28N-58E-7: all, 8: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion. Operations must commence within one year of date of order. The overlapping temporary spacing unit shall be limited to the production from the proposed horizontal well. Amend Order 310-2014 to clarify that said order is limited to the Snyder 1-12 #1H well. Vacate Order 311-2014 (Authorization to drill up to four wells, PSU, Bkn/TF Formation, 28N-57E-1: all, 12: all). Amend that operations must commence not later than the date of the Board's regularly-scheduled April 2027 hearing.	<i>Original OTSU order issued 4/10/2025, request extension of operations commence date to April 2027 hearing.</i> <input type="checkbox"/>
293-2026 Kraken Oil & Gas LLC	Amend Order 91-2025 (Designate OTSU, Bkn/TF Formation, 29N-58E-17: all, 20: all, 29: all, 32: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion. Operations must commence within one year of date of order. The overlapping temporary spacing unit shall be limited to the production from the proposed horizontal well. Amend Order 237-2014 to clarify that said order is limited to the Briske 1-20H well. Vacate Order 238-2014 (drill three additional wells, PSU, Bkn/TF Formation, 29N-58E-17: all, 20: all). Amend that operations must commence not later than the date of the Board's regularly-scheduled April 2027 hearing.	<i>Original OTSU order issued 4/10/2025, request extension of operations commence date to April 2027 hearing.</i> <input type="checkbox"/>
294-2026 Kraken Oil & Gas LLC	Amend Order 93-2025 (Designate OTSU, Bkn/TF Formation, 29N-58E-18: all, 19: all, 30: all, 31: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion. Operations must commence within one year of date of order. The overlapping temporary spacing unit shall be limited to the production from the proposed horizontal well. Amend Order 282-2013 to clarify that said order is limited to the Langdon 1-19H well. Vacate Order 283-2013 (drill up to three additional wells, PSU, Bkn/TF Formation, 29N-58E-18: all, 19: all). Amend that operations must commence not later than the date of the Board's regularly-scheduled April 2027 hearing.	<i>Original OTSU order issued 4/10/2025, request extension of operations commence date to April 2027 hearing.</i> <input type="checkbox"/>

295-2026	Kraken Oil & Gas LLC	Amend Orders 42-2022 and 146-2024 (Designate OTSU, Bkn/TF Formation, 26N-57E 4: all, 9: all, and 27N-57E 33: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion. Operations must commence within one year of date of order. Amend Board Order 40-2017 to clarify said order is limited to the Shayla 34-33 #1H well. Vacate Order 376-2012 (Exception to Order 380-2011 as it pertains to 26N-57E-4: all, 9: all to authorize 200' toe/heel and 500' lateral setbacks. Lateral setback reverts to 1320' one year from date of hearing.) Amend that operations must commence by 2/15/2026). Amend that operations must commence not later than the date of the Board's regularly-scheduled February 2027 hearing.		<i>Original OTSU order issued 6/16/2022, extended 12/5/2024, now request extension of operations commence date to February 2027 hearing.</i>	<input type="checkbox"/>
296-2026 47-2026 F	Kraken Oil & Gas LLC	Designate overlapping temporary spacing unit, Bakken/Three Forks Formation, 31N-59E-4: all, 5: all, 6: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion. Operations must commence prior to the date of the Board's regularly-scheduled April 2027 hearing. The overlapping temporary spacing unit shall be limited to the production from the proposed horizontal well. Amend Order 64-2013 and BLM Order 1-2013FED to clarify that said order is limited to the Sorenson #34-9H well. Vacate Order 380-2011 (pertaining only to 31N-59E-5: all, 6: all, 7: all, 8: all).	Continued	<i>Related applications, dockets 296, 297-2026 Sections 4 & 9: PSU, 64-2013 (splits PSU in half with docket 298-2026) Continued to June 2026, email received 4/6/26.</i>	<input type="checkbox"/>
297-2026 48-2026 F	Kraken Oil & Gas LLC	Authorize the drilling of three additional horizontal wells, overlapping temporary spacing unit, Bakken/Three Forks Formation, 31N-59E-4: all, 5: all, 6: all, 200' heel/toe setbacks and 500' lateral setbacks.	Continued	<i>Related applications, dockets 296, 297-2026 Continued to June 2026, email received 4/6/26.</i>	<input type="checkbox"/>
298-2026 49-2026 F	Kraken Oil & Gas LLC	Designate overlapping temporary spacing unit, Bakken/Three Forks Formation, 31N-59E-7: all, 8: all, 9: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion. Operations must commence prior to the date of the Board's regularly-scheduled April 2027 hearing. The overlapping temporary spacing unit shall be limited to the production from the proposed horizontal well. Amend Order 64-2013 and BLM Order 1-2013FED to clarify that said order is limited to the Sorenson #34-9H well. Vacate Order 380-2011 (pertaining only to 31N-59E-5: all, 6: all, 7: all, 8: all)	Continued	<i>Related applications, dockets 298, 299-2026 Sections 4 & 9: PSU, 64-2013 (splits PSU in half with docket 298-2026) Continued to June 2026, email received 4/6/26.</i>	<input type="checkbox"/>
299-2026 50-2026 F	Kraken Oil & Gas LLC	Authorize the drilling of three additional horizontal wells, overlapping temporary spacing unit, Bakken/Three Forks Formation, 31N-59E-7: all, 8: all, 9: all, 200' heel/toe setbacks and 500' lateral setbacks.	Continued	<i>Related applications, dockets 298, 299-2026 Continued to June 2026, email received 4/6/26.</i>	<input type="checkbox"/>

300-2026	Kraken Oil & Gas LLC	<p>Designate temporary spacing unit, Bakken/Three Forks Formation, 31N-59E-18: all, 19: all, 30: all, 31: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion. Operations must commence prior to the date of the Board's regularly-scheduled April 2027 hearing.</p> <p>Vacate Orders 60-2010 (TSU, Bkn Formation, 31N-59E-18: all, 19: all), Order 63-2011 (TSU, Bkn/TF Formation, 31N-59E-30: all, 31: all), and Order 265-2012 (Amend Order 380-2011 and 63-2011 to allow 200' heel/toe and 660' lateral setback in TSU comprised of 31N-59E-30: all, 31: all, Bakken/Three Forks Formation. Apply for permanent spacing within 90 days of completion. [See order findings of fact for additional description.]).</p>	Continued	<p>Related applications, dockets 300, 301-2026 Continued to June 2026, email received 4/6/26.</p>	<input type="checkbox"/>
301-2026	Kraken Oil & Gas LLC	<p>Authorize the drilling of three additional horizontal wells, temporary spacing unit, Bakken/Three Forks Formation, 31N-59E-18: all, 19: all, 30: all, 31: all, 200' heel/toe setbacks and 500' lateral setbacks.</p>	Continued	<p>Related applications, dockets 300, 301-2026 Continued to June 2026, email received 4/6/26.</p>	<input type="checkbox"/>
302-2026	Kraken Oil & Gas LLC	<p>Designate overlapping temporary spacing unit, Bakken/Three Forks Formation, 31N-59E-17: all, 20: all, 29: all, 32: all, 200' heel/toe setbacks and 500' lateral setbacks. The overlapping temporary spacing unit shall be limited to production from the proposed horizontal well. Apply for permanent spacing within 90 days of completion. Operations must commence prior to the date of the Board's regularly-scheduled April 2027 hearing.</p> <p>Amend Order 63-2013 to clarify that said order is limited to the Raymond Sweet #31-29H well.</p> <p>Vacate Order 59-2010 (TSU, Bkn Formation, 31N-59E-17: all, 20: all).</p>	Continued	<p>Related applications, dockets 302, 303-2026 Sections 29 & 32: PSU, 63-2013 Sections 17 & 20: TSU, 59-2010 Continued to June 2026, email received 4/6/26.</p>	<input type="checkbox"/>
303-2026	Kraken Oil & Gas LLC	<p>Authorize the drilling of three additional horizontal wells, overlapping temporary spacing unit, Bakken/Three Forks Formation, 31N-59E-17: all, 20: all, 29: all, 32: all, 200' heel/toe setbacks and 500' lateral setbacks.</p>	Continued	<p>Related applications, dockets 302, 303-2026 Continued to June 2026, email received 4/6/26.</p>	<input type="checkbox"/>
304-2026	Kraken Oil & Gas LLC	<p>Designate overlapping temporary spacing unit, Bakken/Three Forks Formation, 31N-58E-1: all, 12: all, 13: all, 24: all, 200' heel/toe setbacks and 500' lateral setbacks. The overlapping temporary spacing unit shall be limited to production from the proposed horizontal well. Apply for permanent spacing within 90 days of completion. Operations must commence prior to the date of the Board's regularly-scheduled April 2027 hearing.</p> <p>Amend Order 447-2012 to clarify that said order is limited to the Orville Hendrickson 24-12H well. Amend Order 445-2012 to clarify that said order is limited to the Dave Clark 21-13H well.</p>	Continued	<p>Related applications, dockets 304, 305-2026 Sections 1 & 12: PSU, 446-2012; pooling, 447-2012 Sections 13 & 24: PSU, 444-2012; pooling, 445-2012 Continued to June 2026, email received 4/6/26.</p>	<input type="checkbox"/>
305-2026	Kraken Oil & Gas LLC	<p>Authorize the drilling of three additional horizontal wells, overlapping temporary spacing unit, Bakken/Three Forks Formation, 31N-58E-1: all, 12: all, 13: all, 24: all, 200' heel/toe setbacks and 500' lateral setbacks.</p>	Continued	<p>Related applications, dockets 304, 305-2026 Continued to June 2026, email received 4/6/26.</p>	<input type="checkbox"/>

306-2026 51-2026 F	Kraken Oil & Gas LLC	<p>Designate overlapping temporary spacing unit, Bakken/Three Forks Formation, 31N-58E-2: all, 11: all, 14: all, 23: all, 200' heel/toe setbacks and 500' lateral setbacks. The overlapping temporary spacing unit shall be limited to production from the proposed horizontal well. Apply for permanent spacing within 90 days of completion. Operations must commence prior to the date of the Board's regularly-scheduled April 2027 hearing.</p> <p>Amend Order 165-2012 and BLM Order (# unknown) to clarify that said order is limited to the Wegner 34-11H well.</p> <p>Vacate Order 5-2011 (TSU, Bk Formation, 31N-58E-14: all, 23: all). Vacate Order 394-2011 (Amend Order 5-2011 to allow 200' heel/toe and 1320' lateral setback in TSU, 31N-58E-14: all, 23: all). Vacate Order 262-2012 (Amend Order 380-2011 and 394-2011 to allow 200' heel/toe and 660' lateral setback in TSU comprised of 31N-58E-14: all, 23: all, Bakken/Three Forks Formation).</p>	Continued	<i>Related applications, dockets 306, 307-2026 Sections 2 & 11: PSU, 165-2012 Continued to June 2026, email received 4/6/26.</i>	<input type="checkbox"/>
307-2026 52-2026 F	Kraken Oil & Gas LLC	<p>Authorize the drilling of three additional horizontal wells, overlapping temporary spacing unit, Bakken/Three Forks Formation, 31N-58E-2: all, 11: all, 14: all, 23: all, 200' heel/toe setbacks and 500' lateral setbacks.</p>	Continued	<i>Related applications, dockets 306, 307-2026 Continued to June 2026, email received 4/6/26.</i>	<input type="checkbox"/>
308-2026	Phoenix Operating LLC	<p>Designate temporary spacing unit, Bakken/Three Forks Formation, 29N-56E-2: all, 11: all, 14: all, 23: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion. Operations must commence within one year of date of order.</p> <p>Vacate Orders 222-2010 (TSU, Bkn Formation, 29N-56E-14: all, 23: all), and Order 380-2011 (pertaining only to 29N-56E-2: all, 11: all).</p>		<i>Related dockets: 308 & 309-2026</i>	<input type="checkbox"/>
309-2026	Phoenix Operating LLC	<p>Authorize the drilling of three additional horizontal wells, temporary spacing unit, Bakken/Three Forks Formation, 29N-56E-2: all, 11: all, 14: all, 23: all, 200' heel/toe setbacks and 500' lateral setbacks.</p>		<i>Related dockets: 308 & 309-2026</i>	<input type="checkbox"/>
310-2026	Phoenix Operating LLC	<p>Designate temporary spacing unit, Bakken/Three Forks Formation, 30N-58E-17: all, 20: all, 29: all, 32: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion. Operations must commence within one year of date of order.</p> <p>Vacate Orders 246-2010 (TSU, Bakken Formation, 30N-58E-17: all, 20: all), and Order 380-2011 (pertaining only to 29N-56E-29: all, 32: all).</p>		<i>Related dockets: 310 & 311-2026</i>	<input type="checkbox"/>
311-2026	Phoenix Operating LLC	<p>Authorize the drilling of three additional horizontal wells, temporary spacing unit, Bakken/Three Forks Formation, 30N-58E-17: all, 20: all, 29: all, 32: all, 200' heel/toe setbacks and 500' lateral setbacks.</p>		<i>Related dockets: 310 & 311-2026</i>	<input type="checkbox"/>

312-2026	Phoenix Operating LLC	<p>Temporary spacing unit, Bakken/Three Forks Formation, 25N-56E-5: all, 8: all, 17: all, 20: all, 29: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion. Operations must commence within one year of date of order.</p> <p>Vacate Order 359-2011 (TSU, Bkn Formation, 25N-56E-5: all, 8: all), Order 116-2006 (TSU, Bkn Formation, 25N-56E-19: all, 20: all), and Order 380-2011 (pertaining only to 25N-56E-29: all).</p>	Protest ??	<p>5 mile long lateral Related to APD protest docket 217-2026 Related dockets: 312, 313-2026 Maybe protested by Continental, email received 4/6/2026.</p>	<input type="checkbox"/>
313-2026	Phoenix Operating LLC	<p>Authorize the drilling of three additional horizontal wells, temporary spacing unit, Bakken/Three Forks Formation, 25N-56E-5: all, 8: all, 17: all, 20: all, 29: all, 200' heel/toe setbacks and 500' lateral setbacks.</p>	Protest ??	<p>Related dockets: 312, 313-2026 Maybe protested by Continental, email received 4/6/2026.</p>	<input type="checkbox"/>
314-2026	Phoenix Operating LLC	<p>Designate temporary spacing unit, Bakken/Three Forks Formation, 23N-58E-2: all, 11: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion. Operations must commence within one year of date of order.</p> <p>Vacate Order 138-2011 (TSU, Bkn Formation, 23N-58E-2: all, 11: all).</p>	Withdrawn	<p>Already TSU under order 138-2011, need for setback amendment? Phoenix originally requested TSU of 2, 11, 14, & 23, but existing wellbore caused issue. Two section TSU could orphan N/2 of 14, similar to issue with docket 281 & 282-2026 Related dockets: 314 & 315-2026 Withdrawn, email received 4/6/26.</p>	<input type="checkbox"/>
315-2026	Phoenix Operating LLC	<p>Authorize the drilling of three additional horizontal wells, temporary spacing unit, Bakken/Three Forks Formation, 23N-58E-2: all, 11: all, 200' heel/toe setbacks and 500' lateral setbacks.</p>	Withdrawn	<p>Related dockets: 314 & 315-2026 Withdrawn, email received 4/6/26.</p>	<input type="checkbox"/>
316-2026	Phoenix Operating LLC	<p>Temporary spacing unit, Bakken/Three Forks Formation, 26N-55E-23: all, 26: all, and 35: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion. Operations must commence within one year of date of order.</p> <p>Vacate Order 71-2010 (TSU, Bkn Formation, 26N-55E-14: all, 23: all) and Order 294-2011 (Amend setbacks) Vacate Order 380-2011 (pertaining only to 26N-55E-26: all, 35: all).</p>	Continued	<p>Related applications, dockets 316, 317-2026 Conflicts with Continental dockets 271 & 272-2026 Continued to June 2026, email received 4/2/26.</p>	<input type="checkbox"/>
317-2026	Phoenix Operating LLC	<p>Authorize the drilling of three additional horizontal wells, temporary spacing unit, Bakken/Three Forks Formation, 26N-55E-23: all, 26: all, and 35: all, 200' heel/toe setbacks and 500' lateral setbacks.</p>	Continued	<p>Related applications, dockets 316, 317-2026 Continued to June 2026, email received 4/2/26.</p>	<input type="checkbox"/>
318-2026	Phoenix Operating LLC	<p>Temporary spacing unit, Bakken/Three Forks Formation, 30N-59E-31: all, 32: all, 33: all, and 30N-58E-36: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion. Operations must commence within one year of date of order.</p> <p>Vacate Order 131-2010 (TSU, Bkn Formation, 30N-59E-30: all, 31: all), Order 130-2010 (TSU, Bkn Formation, 30N-59E-29: all, 32: all) Vacate Order 78-2024 (TSU, Bkn Formation, 30N-59E-20: all, 29: all, 32: all) and order 79-2024 (Well density) Vacate Order 380-2011 (pertaining only to 30N-59E-33: all and 30N-58E-36: all).</p>		<p>Related dockets: 318, 319-2026</p>	<input type="checkbox"/>

319-2026	Phoenix Operating LLC	Authorize the drilling of three additional horizontal wells, temporary spacing unit, Bakken/Three Forks Formation, 30N-59E-31: all, 32: all, 33: all, and 30N-58E-36: all, 200' heel/toe setbacks and 500' lateral setbacks.		<i>Related docket: 318, 319-2026</i>	<input type="checkbox"/>
320-2026	Hydra Services LLC	Approval to drill, Class II SWD Injection well (Pearl 9-H SWD), Dakota Formation, T28N-R58E-9: SW NW.			<input type="checkbox"/>
321-2026	Phoenix Operating LLC	Approval to drill, Class II SWD Injection well (Bonsai 1 SWD), Dakota Formation, T28N-R57E-3: Lot 1.			<input type="checkbox"/>
322-2026	Phoenix Operating LLC	Approval to drill, Class II SWD Injection well (Origami 1 SWD), Dakota Formation, T28N-R57E-3: Lot 1.			<input type="checkbox"/>
323-2026	Phoenix Operating LLC	Approval to drill, Class II SWD Injection well (Katana 1 SWD), Dakota Formation, T28N-R57E-6: SE NE.			<input type="checkbox"/>
324-2026	Phoenix Operating LLC	Approval to drill, Class II SWD Injection well (Kimono 1 SWD), Dakota Formation, T29N-R57E-31: SW SE.			<input type="checkbox"/>
325-2026	MorningStar Operating LLC	Convert the BR 33X-5 well, T24N-R56E-5: NW SE (API #25- 083-22071) to Class II Injection well, Dakota and Lakota Formations.			<input type="checkbox"/>
310-2025	Kraken Oil & Gas LLC	Designate temporary spacing unit, Bakken/Three Forks Formation, 28N-55E-25: all and 28N-56E-28: all, 29: all, 30: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion. Operations must commence within two years of date of order. Vacate Orders 30-2011 (TSU, Bkn Formation, 28N-56E-28: all, 33: all) and Order 340-2011 (Amend Board Order 30-2011 (TSU, 28N-56E-28, 33) to allow 200' heel/toe, 1320' side setbacks in TSU, Bkn/TF Formation)	Withdrawn	<i>Conflict with order 322-2025 (Phoenix), can't be approved Conflict with dockets 198 & 199-2026 (Continental) Related applications: 310-2025, 311-2025 Protested by Phoenix Operating, email received 9/29, 12/9/25, 2/3/2026. Continued to the December hearing, email received 10/3/25. Continued at the hearing to February 2026. Continued to April, email received 2/6/2026. Withdrawn, email received 4/1/26</i>	<input type="checkbox"/>
311-2025	Kraken Oil & Gas LLC	Authorize the drilling of three additional horizontal wells, temporary spacing unit, Bakken/Three Forks Formation, 28N-55E-25: all and 28N-56E-28: all, 29: all, 30: all, 200' heel/toe setbacks and 500' lateral setbacks.	Withdrawn	<i>Related applications: 310-2025, 311-2025 Protested by Phoenix Operating, email received 9/29, 12/9/25, 2/3/2026. Continued to the December hearing, email received 10/3/25. Continued at the hearing to February 2026. Continued to April, email received 2/6/2026. Withdrawn, email received 4/1/26</i>	<input type="checkbox"/>

316-2025	Kraken Oil & Gas LLC	Designate temporary spacing unit, Bakken/Three Forks Formation, 23N-59E-31: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion. Operations must commence within two years of date of order.	Continued	Continued to the December hearing, email received 10/2/25. Continued to the February hearing, email received 11/6/25. Continued to the April hearing, email received 2/3/26. Continued to the June hearing, email received 3/31/26. Protested by Phoenix Operating, email received 2/3/2026.	<input type="checkbox"/>
51-2026	Kraken Oil & Gas LLC	Hearing on Kraken's application for permit to drill in T26N-R58E-18, 19, 30; protest filed by Continental Resources Inc. (Adams 30-19-18 #1H)	Continued	Protest - 1/6/26 hand delivered TSU, order 344-2025, well density, order 345-2025 Kraken permit received 12/19/25, latest ad date 12/24/25 No competing Continental APD for this hearing Continued to April, email received 2/6/2026. Continued to June, email received 4/6/2026.	<input type="checkbox"/>
53-2026	MorningStar Operating LLC	Permanent spacing unit, Bakken/Three Forks Formation, 25N-54E-33: all, 34: all and 24N-54E-1: all, 2: all, 11: all, 12: all (Shiv Roy 33-11-1H).		OTSU, Order 148-2025 Related applications, dockets 53, 54-2026 Continued to the April hearing, email received 2/5/26.	<input type="checkbox"/>
54-2026	MorningStar Operating LLC	Pooling, permanent spacing unit, Bakken/Three Forks Formation, 25N-54E-33: all, 34: all and 24N-54E-1: all, 2: all, 11: all, 12: all (Shiv Roy 33-11-1H). Non-consent penalties requested.		Related applications, dockets 53, 54-2026 Continued to the April hearing, email received 2/5/26.	<input type="checkbox"/>
56-2026	Devon Energy Williston, L.L.C.	Permanent spacing unit, Bakken/Three Forks Formation, 28N-59E-23: all, 24: all, 25: all, 26: all, 35: all, 36: all (Challenger 23-35F 2H, Challenger 23-35F 3H, Challenger 23-35F 4H, Challenger 23-35F 5H, and Challenger 24-36F 6H).	Continued	TSU, Order 38-2023, well density, order 39-2023 Related dockets: 56, 57-2026 Continued to April, email received 2/6/2026. Continued to June, email received 4/7/2026.	<input type="checkbox"/>
57-2026	Devon Energy Williston, L.L.C.	Pooling, permanent spacing unit, Bakken/Three Forks Formation, 28N-59E-23: all, 24: all, 25: all, 26: all, 35: all, 36: all (Challenger 23-35F 2H, Challenger 23-35F 3H, Challenger 23-35F 4H, Challenger 23-35F 5H, and Challenger 24-36F 6H).	Continued	Related dockets: 56, 57-2026 Continued to April, email received 2/6/2026. Continued to June, email received 4/7/2026.	<input type="checkbox"/>

70-2026	White Rock Oil & Gas, LLC	<p>Overlapping temporary spacing unit, Bakken/Three Forks Formation, 25N-57E-13: all, 14: all, and 25N-58E-17: all, 18: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion. Operations must commence within one year of date of order.</p> <p>Amend Order 258-2013 to clarify that said order is limited to the Sundheim 31-17-1H well.</p> <p>Vacate Orders 259-2013 (drill up to three additional wells, PSU, Bkn/TF Formation, 25N-58E-17: all, 20: all), 85-2024 (TSU, Bkn/TF Formation, 25N-57E-13: all, 14: all, 25N-58E-18: all, [Amended by order 180-2025].), 86-2024 (drilling of three additional horizontal wells, TSU, Bkn/TF Formation, 25N-57E-13: all, 14: all, 25N-58E-18: all), and 180-2025 (Amend Order 85-2024 (TSU, Bkn/TF Formation, 25N-57E-13: all, 14: all, 25N-58E-18: all, Amend that operations must commence by 8/15/2026.).</p>	Withdrawn	<p><i>Request to vacate order issued in last year at their request</i></p> <p><i>Conflicts with Whiting applications 258 & 259-2026</i></p> <p><i>Sections 17 & 20: PSU, order 257-2013; pooling, order 258-2013, well density, order 259-2013</i></p> <p><i>Well in section 17 & 20 operated by Whiting</i></p> <p><i>Related dockets: 70 & 71-2026</i></p> <p><i>Continued to April, email received 2/6/2026.</i></p> <p><i>Withdrawn, email received 4/1/26.</i></p>	<input type="checkbox"/>
71-2026	White Rock Oil & Gas, LLC	<p>Authorize the drilling of three additional horizontal wells, overlapping temporary spacing unit, Bakken/Three Forks Formation, 25N-57E-13: all, 14: all, and 25N-58E-17: all, 18: all, 200' heel/toe setbacks and 500' lateral setbacks.</p>	Withdrawn	<p><i>Related dockets, 70 & 71-2026</i></p> <p><i>Continued to April, email received 2/6/2026.</i></p> <p><i>Withdrawn, email received 4/1/26.</i></p>	<input type="checkbox"/>
72-2026	White Rock Oil & Gas, LLC	<p>Overlapping temporary spacing unit, Bakken/Three Forks Formation, 25N-57E-23: all, 24: all, and 25N-58E-19: all, 20: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion. Operations must commence within one year of date of order.</p> <p>Amend Order 258-2013 to clarify that said order is limited to the Sundheim 31-17-1H well.</p> <p>Vacate Orders 259-2013 (drill up to three additional wells, PSU, Bkn/TF Formation, 25N-58E-17: all, 20: all), Order 87-2024 (TSU, Bkn/TF Formation, 25N-57E-23: all, 24: all, 25N-58E-19: all), Order 88-2024 (Authorize the drilling of three additional horizontal wells, TSU, Bkn/TF Formation, 25N-57E-23: all, 24: all, 25N-58E-19: all), and Order 181-2025 (Amend Order 87-2024 (TSU, Bkn/TF Formation, 25N-57E-23: all, 24: all, 25N-58E-19: all, Amend that operations must commence by 8/15/2026.).</p>	Withdrawn	<p><i>Request to vacate order issued in last year at their request</i></p> <p><i>Conflicts with Whiting applications 258 & 259-2026</i></p> <p><i>Sections 17 & 20: PSU, order 257-2013; pooling, order 258-2013, well density, order 259-2013</i></p> <p><i>Well in section 17 & 20 operated by Whiting</i></p> <p><i>Related dockets, 72 & 73-2026</i></p> <p><i>Continued to April, email received 2/6/2026.</i></p> <p><i>Withdrawn, email received 4/1/26.</i></p>	<input type="checkbox"/>
73-2026	White Rock Oil & Gas, LLC	<p>Authorize the drilling of three additional horizontal wells, overlapping temporary spacing unit, Bakken/Three Forks Formation, 25N-57E-23: all, 24: all, and 25N-58E-19: all, 20: all, 200' heel/toe setbacks and 500' lateral setbacks.</p>	Withdrawn	<p><i>Related dockets, 72 & 73-2026</i></p> <p><i>Continued to April, email received 2/6/2026.</i></p> <p><i>Withdrawn, email received 4/1/26.</i></p>	<input type="checkbox"/>
88-2026 16-2026 F	Kraken Oil & Gas LLC	<p>Amend Order 79-2025 and 9-2025 FED (Designate TSU, Bkn/TForks Formation, 27N-56E-5: all, 8: all, 17: all, 20: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion. Operations must commence within one year of date of order. Vacate Order 54-2011 (TSU, Bkn Formation, 27N-56E-17: all, 20: all)). Amend that operations must commence not later than the date of the Board's regularly-scheduled February 2027 hearing.</p>		<p><i>TSU, order 79-2025 (expires 4/10/26)</i></p> <p><i>Kraken has active APD in TSU that expires 8/6/26</i></p> <p><i>Protested by Phoenix, email received 2/3/2026; protest withdrawn 4/7/2026 via email.</i></p> <p><i>Continued to April, email received 2/6/2026.</i></p>	<input type="checkbox"/>

90-2026 17-2026 F	Kraken Oil & Gas LLC	Designate temporary spacing unit, Bakken/Three Forks Formation, 28N-55E-36: all and 28N-56E-31: all, 32: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion. Operations must commence not later than the date of the Board's regularly-scheduled February 2027 hearing. Vacate Order 380-2011 (pertaining only to 28N-55E-36: all and 28N-56E-31: all, 32: all).	Continued	36: Subject to request in docket 198 & 199-2026 (TSU/Well density, Continental) Related to APD protest dockets 223-2026 Related dockets: 90 & 91-2026 Protested by Phoenix, email received 2/3/2026. Protested by Continental, email received 2/10/2026. Continued at the hearing to April 2026. Continued to June 2026, email received 4/2/26.	<input type="checkbox"/>
91-2026 18-2026 F	Kraken Oil & Gas LLC	Authorize the drilling of three additional horizontal wells, temporary spacing unit, Bakken/Three Forks Formation, 28N-55E-36: all and 28N-56E-31: all, 32: all, 200' heel/toe setbacks and 500' lateral setbacks.	Continued	Related dockets: 90 & 91-2026 Protested by Phoenix, email received 2/3/2026. Protested by Continental, email received 2/10/2026. Continued at the hearing to April 2026. Continued to June 2026, email received 4/2/26.	<input type="checkbox"/>
112-2026	Phoenix Operating LLC	Designate temporary spacing unit, Bakken/Three Forks Formation, 29N-56E-3: all, 10: all, 15: all, 22: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion. Operations must commence within one year of date of order. Vacate Orders 223-2010 (TSU, Bkn Formation, 29N-56E-15: all, 22: all) and Order 380-2011 (pertaining only to 29N-56E-3: all, 10: all).		Related dockets: 112 & 113-2026 Continued to April 2026, email received 2/3/26.	<input type="checkbox"/>
113-2026	Phoenix Operating LLC	Authorize the drilling of three additional horizontal wells, temporary spacing unit, Bakken/Three Forks Formation, 29N-56E-3: all, 10: all, 15: all, 22: all, 200' heel/toe setbacks and 500' lateral setbacks.		Related dockets: 112 & 113-2026 Continued to April 2026, email received 2/3/26.	<input type="checkbox"/>
114-2026	Phoenix Operating LLC	Designate temporary spacing unit, Bakken/Three Forks Formation, 29N-56E-5: all, 8: all, 17: all, 20: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion. Operations must commence within one year of date of order. Vacate Orders 11-2011 (TSU, Bakken / Three Forks Formations, 29N-56E-5: all, 8: all, 1320' side and 660' toe and heel setback. (Amended by Order 206-2011 to include Three Forks Formation.)), Order 206-2011 (Amend Order 11-2011 to include Three Forks Formation and allow 1320' lateral, 660' heel/toe setback, 29N-56E-5: all, 8: all), and Order 380-2011 (pertaining only to 29N-56E-17: all, 20: all).		Related dockets: 114 & 115-2026 Continued to April 2026, email received 2/3/26.	<input type="checkbox"/>
115-2026	Phoenix Operating LLC	Authorize the drilling of three additional horizontal wells, temporary spacing unit, Bakken/Three Forks Formation, 29N-56E-5: all, 8: all, 17: all, 20: all, 200' heel/toe setbacks and 500' lateral setbacks.		Related dockets: 114 & 115-2026 Continued to April 2026, email received 2/3/26.	<input type="checkbox"/>

116-2026	Phoenix Operating LLC	<p>Designate temporary spacing unit, Bakken/Three Forks Formation, 29N-56E-6: all, 7: all, 18: all, 19: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion. Operations must commence within one year of date of order.</p> <p>Vacate Orders 72-2011 (TSU, Bakken/Three Forks Formations, 29N-56E-6: all, 7: all, 660' heel/toe setback, 1320' lateral setback. Apply for permanent spacing within 90 days of completion. (Amended by Order 207-2011 to include Three Forks Formation.)), Order 207-2011 (Amend Order 72-2011 to include Three Forks Formation and allow 1320' lateral, 660' heel/toe setback, 29N-56E-6: all, 7: all) and Order Order 380-2011 (pertaining only to 29N-56E-18: all, 19: all).</p>		<p><i>Related dockets: 116 & 117-2026</i> <i>Continued to April 2026, email received 2/3/26.</i></p>	<input type="checkbox"/>
117-2026	Phoenix Operating LLC	<p>Authorize the drilling of three additional horizontal wells, temporary spacing unit, Bakken/Three Forks Formation, 29N-56E-6: all, 7: all, 18: all, 19: all, 200' heel/toe setbacks and 500' lateral setbacks.</p>		<p><i>Related dockets: 116 & 117-2026</i> <i>Continued to April 2026, email received 2/3/26.</i></p>	<input type="checkbox"/>
134-2026 23-2026 F	Phoenix Operating LLC	<p>Designate temporary spacing unit, Bakken/Three Forks Formation, 27N-55E-1: all, 12: all, 13: all, 24: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion. Operations must commence within one year of date of order.</p> <p>Vacate Order 380-2011 (pertaining only to 27N-55E-1: all, 12: all, 13: all, 24: all).</p>	Continued	<p><i>Conflicts with Continental dockets 188, 189, 198 & 199-2026</i> <i>Related dockets: 134 & 135-2026</i> <i>Protested by Continental, email received 2/10/2026.</i> <i>Continued at the hearing to April 2026.</i> <i>Continued to June 2026, email received 4/2/26.</i></p>	<input type="checkbox"/>
135-2026 24-2026 F	Phoenix Operating LLC	<p>Authorize the drilling of three additional horizontal wells, temporary spacing unit, Bakken/Three Forks Formation, 27N-55E-1: all, 12: all, 13: all, 24: all, 200' heel/toe setbacks and 500' lateral setbacks.</p>	Continued	<p><i>Related dockets: 134 & 135-2026</i> <i>Protested by Continental, email received 2/10/2026.</i> <i>Continued at the hearing to April 2026.</i> <i>Continued to June 2026, email received 4/2/26.</i></p>	<input type="checkbox"/>
146-2026	Phoenix Operating LLC	<p>Temporary spacing unit, Bakken/Three Forks Formation, 27N-55E-28: all, 33: all, and 26N-55E-4: all, 9: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion. Operations must commence within one year of date of order.</p> <p>Vacate Order 436-2005 (TSU, Bkn Formation, 26N-55E-4: all, 9: all), Order 293-2011 (Amend setbacks, Bkn Formation, 26N-55E-4: all, 9: all), and Order 380-2011 (pertaining only to 27N-55E-28: all, 33: all).</p>	Continued	<p><i>Conflicts with Continental dockets 265 & 266-2026</i> <i>Related dockets: 146 & 147-2026</i> <i>Continued to April 2026, email received 2/3/26.</i> <i>Continued to June 2026, email received 4/2/26.</i></p>	<input type="checkbox"/>
147-2026	Phoenix Operating LLC	<p>Authorize the drilling of three additional horizontal wells, temporary spacing unit, Bakken/Three Forks Formation, 27N-55E-28: all, 33: all, and 26N-55E-4: all, 9: all, 200' heel/toe setbacks and 500' lateral setbacks.</p>	Continued	<p><i>Related dockets: 146 & 147-2026</i> <i>Continued to April 2026, email received 2/3/26.</i> <i>Continued to June 2026, email received 4/2/26.</i></p>	<input type="checkbox"/>

150-2026	Phoenix Operating LLC	<p>Temporary spacing unit, Bakken/Three Forks Formation, 26N-55E-2: all, 11: all, and 14: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion. Operations must commence within one year of date of order.</p> <p>Vacate Order 438-2005 (TSU, Bkn Formation, 26N-55E-2: all, 11: all), Order 293-2011 (Amend setbacks, Bkn Formation, 26N-55E-2: all, 11: all).</p> <p>Vacate Order 71-2010 (TSU, Bkn Formation, 26N-55E-14: all, 23: all), Order 294-2011 (Amend setbacks, Bkn Formation, 26N-55E-14: all, 23: all).</p>	Continued	<p>Related dockets: 150 & 151-2026 Continued to April 2026, email received 2/3/26. Continued to June 2026, email received 4/2/26.</p>	<input type="checkbox"/>
151-2026	Phoenix Operating LLC	<p>Authorize the drilling of three additional horizontal wells, temporary spacing unit, Bakken/Three Forks Formation, 26N-55E-2: all, 11: all, and 14: all, 200' heel/toe setbacks and 500' lateral setbacks.</p>	Continued	<p>Related dockets: 150 & 151-2026 Continued to April 2026, email received 2/3/26. Continued to June 2026, email received 4/2/26.</p>	<input type="checkbox"/>
152-2026	Phoenix Operating LLC	<p>Temporary spacing unit, Bakken/Three Forks Formation, 26N-55E-3: all, 10: all, 15: all, 22: all, and 27: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion. Operations must commence within one year of date of order.</p> <p>Vacate Order 437-2005 (TSU, Bkn Formation, 26N-55E-3: all, 10: all) and Order 168-2011 (Amend setbacks)</p> <p>Vacate Order 357-2011 (TSU, Bkn Formation, 26N-55E-15: all, 22: all)</p> <p>Vacate Order 380-2011 (pertaining only to 26N-55E-27: all).</p>	Continued	<p>5 mile long lateral? Conflicts with Continental dockets 273 & 274-2026 Related dockets: 152 & 153-2026 Continued to April 2026, email received 2/3/26. Continued to June 2026, email received 4/2/26.</p>	<input type="checkbox"/>
153-2026	Phoenix Operating LLC	<p>Authorize the drilling of three additional horizontal wells, temporary spacing unit, Bakken/Three Forks Formation, 26N-55E-3: all, 10: all, 15: all, 22: all, and 27: all, 200' heel/toe setbacks and 500' lateral setbacks.</p>	Continued	<p>Related dockets: 152 & 153-2026 Continued to April 2026, email received 2/3/26. Continued to June 2026, email received 4/2/26.</p>	<input type="checkbox"/>
164-2026	Phoenix Operating LLC	<p>Temporary spacing unit, Bakken/Three Forks Formation, 29N-55E-22: all, 27: all, 34: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion. Operations must commence within one year of date of order.</p> <p>Vacate Order 267-2011 (TSU, Bkn Formation, 29N-55E-33: all, 34: all)</p> <p>Vacate Order 380-2011 (pertaining only to 29N-55E-22: all, 27: all).</p>	Withdrawn	<p>Related dockets: 164, 165-2026 Continued to April 2026, email received 2/3/26. Withdrawn, email received 4/8/26.</p>	<input type="checkbox"/>
165-2026	Phoenix Operating LLC	<p>Authorize the drilling of three additional horizontal wells, temporary spacing unit, Bakken/Three Forks Formation, 29N-55E-22: all, 27: all, 34: all, 200' heel/toe setbacks and 500' lateral setbacks.</p>	Withdrawn	<p>Related dockets: 164, 165-2026 Continued to April 2026, email received 2/3/26. Withdrawn, email received 4/8/26.</p>	<input type="checkbox"/>

170-2026 31-2026 F	Phoenix Operating LLC	<p>Temporary spacing unit, Bakken/Three Forks Formation, 30N-59E-5: all, 8: all, 17: all, 20: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion. Operations must commence within one year of date of order.</p> <p>Vacate Order 76-2024 (TSU, Bkn Formation, 30N-59E-5: all, 8: all, 17: all) and order 77-2024 (Well density) Vacate Order 78-2024 (TSU, Bkn Formation, 30N-59E-20: all, 29: all, 32: all) and order 79-2024 (Well density)</p>		<p><i>Vacate order that vacated order 85-2010 so TSU of 5 & 8 back in effect?</i> <i>Vacate order that vacated order 130-2010 so TSU of 29 & 32 back in effect?</i> <i>Related dockets: 170, 171-2026</i> <i>Continued to April 2026, email received 2/3/26.</i></p>	<input type="checkbox"/>
171-2026 32-2026 F	Phoenix Operating LLC	<p>Authorize the drilling of three additional horizontal wells, temporary spacing unit, Bakken/Three Forks Formation, 30N-59E-5: all, 8: all, 17: all, 20: all, 200' heel/toe setbacks and 500' lateral setbacks.</p>		<p><i>Related dockets: 170, 171-2026</i> <i>Continued to April 2026, email received 2/3/26.</i></p>	<input type="checkbox"/>
176-2026 37-2026 F	Phoenix Operating LLC	<p>Temporary spacing unit, Bakken/Three Forks Formation, 30N-58E-1: all, 12: all, 13: all, 24: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion. Operations must commence within one year of date of order.</p> <p>Vacate Order 380-2011 (pertaining only to 30N-58E-1: all, 12: all, 13: all, 24: al).</p>		<p><i>Related dockets: 176, 177-2026</i> <i>Continued to April 2026, email received 2/3/26.</i></p>	<input type="checkbox"/>
177-2026 38-2026 F	Phoenix Operating LLC	<p>Authorize the drilling of three additional horizontal wells, temporary spacing unit, Bakken/Three Forks Formation, 30N-58E-1: all, 12: all, 13: all, 24: all, 200' heel/toe setbacks and 500' lateral setbacks.</p>		<p><i>Related dockets: 176, 177-2026</i> <i>Continued to April 2026, email received 2/3/26.</i></p>	<input type="checkbox"/>
188-2026	Continental Resources Inc	<p>Designate temporary spacing unit, Bakken/Three Forks Formation, 27N-55E-13: all, 24: all, 25: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion. Operations must commence within one year of date of order. The overlapping temporary spacing unit shall be limited to the production from the proposed horizontal well.</p>	Continued	<p><i>Conflicts with Phoenix docket 134 & 135-2026</i> <i>Related dockets: 188 & 189-2026</i> <i>Protested by Phoenix, email received 2/3/2026.</i> <i>Continued at the hearing to April 2026.</i> <i>Continued to June 2026, email received 4/2/26.</i></p>	<input type="checkbox"/>
189-2026	Continental Resources Inc	<p>Authorize the drilling of three additional horizontal wells, temporary spacing unit, Bakken/Three Forks Formation, 27N-55E-13: all, 24: all, 25: all, 200' heel/toe setbacks and 500' lateral setbacks.</p>	Continued	<p><i>Related dockets: 188 & 189-2026</i> <i>Protested by Phoenix, email received 2/3/2026.</i> <i>Continued at the hearing to April 2026.</i> <i>Continued to June 2026, email received 4/2/26.</i></p>	<input type="checkbox"/>
190-2026	Continental Resources Inc	<p>Designate temporary spacing unit, Bakken/Three Forks Formation, 27N-55E-14: all, 23: all, 26: all, 35: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion. Operations must commence within one year of date of order. The temporary spacing unit shall be limited to the production from the proposed horizontal well.</p>	Withdrawn	<p><i>Matches Phoenix request in docket 140-2026</i> <i>Related dockets: 190 & 191-2026</i> <i>Protested by Phoenix, email received 2/3/2026.</i> <i>Continued to April, email received 2/6/2026.</i> <i>Withdrawn via email received 3/25/26</i></p>	<input type="checkbox"/>
191-2026	Continental Resources Inc	<p>Authorize the drilling of three additional horizontal wells, temporary spacing unit, Bakken/Three Forks Formation, 27N-55E-14: all, 23: all, 26: all, 35: all, 200' heel/toe setbacks and 500' lateral setbacks.</p>	Withdrawn	<p><i>Matches Phoenix request in docket 141-2026</i> <i>Related dockets: 190 & 191-2026</i> <i>Protested by Phoenix, email received 2/3/2026.</i> <i>Continued to April, email received 2/6/2026.</i> <i>Withdrawn via email received 3/25/26</i></p>	<input type="checkbox"/>

192-2026	Continental Resources Inc	Designate temporary spacing unit, Bakken/Three Forks Formation, 27N-55E-15: all, 22: all, 27: all, 34: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion. Operations must commence within one year of date of order. The temporary spacing unit shall be limited to the production from the proposed horizontal well.	Withdrawn	Matches Phoenix request in docket 142-2026 Related dockets: 192 & 193-2026 Protested by Phoenix, email received 2/3/2026. Continued to April, email received 2/6/2026. Withdrawn via email received 3/25/26	<input type="checkbox"/>
193-2026	Continental Resources Inc	Authorize the drilling of three additional horizontal wells, temporary spacing unit, Bakken/Three Forks Formation, 27N-55E-15: all, 22: all, 27: all, 34: all, 200' heel/toe setbacks and 500' lateral setbacks.	Withdrawn	Matches Phoenix request in docket 143-2026 Related dockets: 192 & 193-2026 Protested by Phoenix, email received 2/3/2026. Continued to April, email received 2/6/2026. Withdrawn via email received 3/25/26	<input type="checkbox"/>
194-2026 39-2026 F	Continental Resources Inc	Designate temporary spacing unit, Bakken/Three Forks Formation, 28N-55E-27: all, 34: all and 27N-55E-3: all, 10: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion. Operations must commence within one year of date of order. The temporary spacing unit shall be limited to the production from the proposed horizontal well.		Related dockets: 194 & 195-2026 Protested by Phoenix, email received 2/3/2026, protest withdrawn via email 2/10/2026. Continued at the hearing to April 2026.	<input type="checkbox"/>
195-2026 40-2026 F	Continental Resources Inc	Authorize the drilling of three additional horizontal wells, temporary spacing unit, Bakken/Three Forks Formation, 28N-55E-27: all, 34: all and 27N-55E-3: all, 10: all, 200' heel/toe setbacks and 500' lateral setbacks.		Related dockets: 194 & 195-2026 Protested by Phoenix, email received 2/3/2026, protest withdrawn via email 2/10/2026. Continued at the hearing to April 2026.	<input type="checkbox"/>
196-2026 41-2026 F	Continental Resources Inc	Designate temporary spacing unit, Bakken/Three Forks Formation, 28N-55E-26 all, 35: all and 27N-55E-2: all, 11: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion. Operations must commence within one year of date of order. The overlapping temporary spacing unit shall be limited to the production from the proposed horizontal well.		Related dockets: 196 & 197-2026 Protested by Phoenix, email received 2/3/2026, protest withdrawn via email 2/10/2026. Continued at the hearing to April 2026.	<input type="checkbox"/>
197-2026 42-2026 F	Continental Resources Inc	Authorize the drilling of three additional horizontal wells, temporary spacing unit, Bakken/Three Forks Formation, 28N-55E-26 all, 35: all and 27N-55E-2: all, 11: all, 200' heel/toe setbacks and 500' lateral setbacks.		Related dockets: 196 & 197-2026 Protested by Phoenix, email received 2/3/2026, protest withdrawn via email 2/10/2026. Continued at the hearing to April 2026.	<input type="checkbox"/>
198-2026 43-2026 F	Continental Resources Inc	Designate temporary spacing unit, Bakken/Three Forks Formation, 28N-55E-25: all, 36: all and 27N-55E-1: all, 12: all, 200' heel/toe setbacks and 500' lateral setbacks. Apply for permanent spacing within 90 days of completion. Operations must commence within one year of date of order. The temporary spacing unit shall be limited to the production from the proposed horizontal well.	Continued	Conflicts with Phoenix docket 134 & 135-2026 & Kraken dockets 90 & 91-2026 Related dockets: 198 & 199-2026 Protested by Phoenix, email received 2/3/2026. Continued at the hearing to April 2026. Assigned a federal docket number, per BLM's request. Continued to June 2026, email received 4/2/26.	<input type="checkbox"/>
199-2026 44-2026 F	Continental Resources Inc	Authorize the drilling of three additional horizontal wells, temporary spacing unit, Bakken/Three Forks Formation, 28N-55E-25: all, 36: all and 27N-55E-1: all, 12: all, 200' heel/toe setbacks and 500' lateral setbacks.	Continued	Related dockets: 198 & 199-2026 Protested by Phoenix, email received 2/3/2026. Continued at the hearing to April 2026. Assigned a federal docket number, per BLM's request. Continued to June 2026, email received 4/2/26.	<input type="checkbox"/>
205-2026	MorningStar Operating LLC	Approval to drill, Class II SWD Injection well (Jaws SWD 1 well), Dakota and Lakota Formations, T22N-R59E-5: NE SE.	Continued	BHL 1926 FSL, 1404 FWL Continued to April due to legal notice error Continued to June, email received 4/6/2026.	<input type="checkbox"/>

326-2026	Grassy Butte LLC	Show Cause: failure to file injection reports and pay administrative fees.		<input type="checkbox"/>
327-2026	Montana Energy Company, LLC	Show Cause: why it should not be assessed additional penalties or have its plugging and reclamation bonds forfeited as permitted by § 82-11-123(5), MCA for failure to begin to plug and abandon or transfer its wells		<input type="checkbox"/>
328-2026	Poplar Resources LLC	Show Cause: why additional penalties should not be assessed for failure to file delinquent production and injection reports, failure to pay the penalty assessed for delinquent reporting, and failure to pay the \$1,000 fine assessed for not appearing at the February 12, 2026, public hearing.		<input type="checkbox"/>
329-2026	R.C.S. Oil, Inc.	Show Cause: failure to pay administrative fees assessed for delinquent reporting.	Dismissed	<input type="checkbox"/> <i>The delinquent fee was received. Docket administratively dismissed in accordance with policy.</i>
330-2026	Solomon Exploration Inc.	Show Cause: failure to pay administrative fees assessed for delinquent reporting.	Dismissed	<input type="checkbox"/> <i>The delinquent fee was received. Docket administratively dismissed in accordance with policy.</i>
88-2025	Coalridge Disposal & Petroleum	Show Cause: why it should not immediately plug and abandon its wells in Sheridan County, Montana, and why additional penalties should not be imposed for failure to file reports, failure to pay the administrative penalty assessed for delinquent production and injection reporting, and failure to pay the outstanding fines.		<input type="checkbox"/>
275-2025	Yellowstone Petroleums, Inc.	Show Cause: why it should not immediately plug and abandon its wells in Carbon, Glacier, Pondera, and Toole Counties, Montana.	Dismissed	<input type="checkbox"/> <i>Order 353-2025 required Myhre 3-25 and Essex-Thompson 1 plugged by April 2026 hearing. Wells plugged in 2/2026, staff dismissed.</i>
470-2025	Brainstorm Energy, Inc.	Show Cause: why it should not be assessed additional penalties for failure to complete plugging and abandonment operations in accordance with the Sundry Notice Conditions of Approval on the Goeddertz 12, API # 25-101-06080, Goeddertz 18, API # 25-101-06087, and Goeddertz 21, API # 25-101-10187, wells, as required by administrative order 11-A-2025.		<input type="checkbox"/>
472-2025	Lustre Salt Water Disp, Vernon R. Justice Dba	Show Cause: why additional penalties should not be assessed for failure to remedy the pit violations, and to discuss its future plans for its Raymond Sonsteng 1-19 SWD well, API # 25-105-21247, located in the NE¼SW¼ of Section 19, T31N-R45E, Valley County, Montana.		<input type="checkbox"/>

ALL APPLICATIONS, 4/9/2026

(In Order of Publication)

Docket	Applicant / Respondent	Status	Request
214-2026	Continental Resources Inc	Withdrawn	APD Protest
215-2026	Continental Resources Inc	Withdrawn	APD Protest
216-2026	Continental Resources Inc	Withdrawn	APD Protest
217-2026	Phoenix Operating LLC	Protested	APD Protest
218-2026	Phoenix Operating LLC	Protested	APD Protest
219-2026	Phoenix Operating LLC	Protested	APD Protest
220-2026	Continental Resources Inc	Dismissed	APD Protest
221-2026	Phoenix Operating LLC	Withdrawn	APD Protest
222-2026	Phoenix Operating LLC	Withdrawn	APD Protest
223-2026	Continental Resources Inc	Continued	APD Protest
224-2026	Kraken Oil & Gas LLC	Dismissed	APD Protest
225-2026	Kraken Oil & Gas LLC	Dismissed	APD Protest
226-2026	Kraken Oil & Gas LLC	Protested	APD Protest
227-2026	Phoenix Operating LLC	Withdrawn	APD Protest
228-2026	Continental Resources Inc	Continued	APD Protest
229-2026	Continental Resources Inc	Continued	APD Protest
230-2026	Continental Resources Inc	Protested	APD Protest
231-2026	Phoenix Operating LLC	Protested	APD Protest
232-2026	Phoenix Operating LLC	Protested	APD Protest
233-2026	Phoenix Operating LLC	Continued	APD Protest
234-2026	Black Dog Operating, LLC	Continued	APD Protest
235-2026	Phoenix Operating LLC	Protested	APD Protest
236-2026	Phoenix Operating LLC	Protested	APD Protest
237-2026	Phoenix Operating LLC	Continued	APD Protest
238-2026	Phoenix Operating LLC	Continued	APD Protest
239-2026	MorningStar Operating LLC		Tax Certification
240-2026	Avanti Helium US, Inc.		Flare / Vent
241-2026	White Rock Oil & Gas, LLC		Spacing
242-2026	White Rock Oil & Gas, LLC		Pooling
243-2026	White Rock Oil & Gas, LLC		Spacing
244-2026	White Rock Oil & Gas, LLC		Pooling
245-2026	White Rock Oil & Gas, LLC		Spacing
246-2026	White Rock Oil & Gas, LLC		Pooling
247-2026	MorningStar Operating LLC		Temp. Spacing
248-2026	MorningStar Operating LLC		Temp. Spacing
249-2026	MorningStar Operating LLC	Withdrawn	Temp. Spacing
250-2026	Whiting Oil and Gas Corporation		Temp. Spacing; Vacate Order
251-2026	Whiting Oil and Gas Corporation		Well Density
252-2026	Whiting Oil and Gas Corporation		Temp. Spacing; Vacate Order
253-2026	Whiting Oil and Gas Corporation		Well Density
254-2026	Whiting Oil and Gas Corporation		Temp. Spacing; Vacate Order

255-2026	Whiting Oil and Gas Corporation		Well Density
256-2026	Whiting Oil and Gas Corporation		Temp. Spacing; Vacate Order
257-2026	Whiting Oil and Gas Corporation		Well Density
258-2026	Whiting Oil and Gas Corporation		Temp. Spacing; Vacate Order
259-2026	Whiting Oil and Gas Corporation		Well Density
260-2026	Whiting Oil and Gas Corporation		Temp. Spacing; Vacate Order
261-2026	Whiting Oil and Gas Corporation		Well Density
262-2026	Oasis Petroleum North America LLC		Temp. Spacing; Vacate Order
263-2026	Oasis Petroleum North America LLC		Well Density
264-2026	Oasis Petroleum North America LLC		Temp. Spacing
265-2026	Continental Resources Inc	Continued	Temp. Spacing; Vacate Order
266-2026	Continental Resources Inc	Continued	Well Density
267-2026	Continental Resources Inc		Temp. Spacing; Vacate Order
268-2026	Continental Resources Inc		Well Density
269-2026	Continental Resources Inc		Temp. Spacing; Vacate Order
270-2026	Continental Resources Inc		Well Density
271-2026	Continental Resources Inc	Continued	Temp. Spacing; Vacate Order
272-2026	Continental Resources Inc	Continued	Well Density
273-2026	Continental Resources Inc	Continued	Temp. Spacing; Vacate Order
274-2026	Continental Resources Inc	Continued	Well Density
275-2026	Continental Resources Inc	Protested	Temp. Spacing; Vacate Order
276-2026	Continental Resources Inc	Protested	Well Density
277-2026	Continental Resources Inc	Protested	Temp. Spacing; Vacate Order
278-2026	Continental Resources Inc	Protested	Well Density
279-2026	Phoenix Operating LLC	Protested	Temp. Spacing
280-2026	Phoenix Operating LLC	Protested	Well Density
281-2026	Phoenix Operating LLC		Temp. Spacing; Vacate Order
282-2026	Phoenix Operating LLC		Well Density
283-2026	Phoenix Operating LLC	Protested	Temp. Spacing
284-2026	Phoenix Operating LLC	Protested	Well Density
285-2026	Phoenix Operating LLC	Protested	Temp. Spacing
286-2026	Phoenix Operating LLC	Protested	Well Density
287-2026	Phoenix Operating LLC	Continued	Temp. Spacing; Vacate Order
288-2026	Phoenix Operating LLC	Continued	Well Density
289-2026	Kraken Oil & Gas LLC		Temp. Spacing
290-2026	Kraken Oil & Gas LLC		Temp. Spacing
291-2026	Kraken Oil & Gas LLC		Temp. Spacing
292-2026	Kraken Oil & Gas LLC		Temp. Spacing
293-2026	Kraken Oil & Gas LLC		Temp. Spacing
294-2026	Kraken Oil & Gas LLC		Temp. Spacing
295-2026	Kraken Oil & Gas LLC		Temp. Spacing
296-2026	Kraken Oil & Gas LLC	Continued	Temp. Spacing
297-2026	Kraken Oil & Gas LLC	Continued	Well Density
298-2026	Kraken Oil & Gas LLC	Continued	Temp. Spacing

299-2026	Kraken Oil & Gas LLC	Continued	Well Density
300-2026	Kraken Oil & Gas LLC	Continued	Temp. Spacing; Vacate Order
301-2026	Kraken Oil & Gas LLC	Continued	Well Density
302-2026	Kraken Oil & Gas LLC	Continued	Temp. Spacing; Vacate Order
303-2026	Kraken Oil & Gas LLC	Continued	Well Density
304-2026	Kraken Oil & Gas LLC	Continued	Temp. Spacing
305-2026	Kraken Oil & Gas LLC	Continued	Well Density
306-2026	Kraken Oil & Gas LLC	Continued	Temp. Spacing; Vacate Order
307-2026	Kraken Oil & Gas LLC	Continued	Well Density
308-2026	Phoenix Operating LLC		Temp. Spacing; Vacate Order
309-2026	Phoenix Operating LLC		Well Density
310-2026	Phoenix Operating LLC		Temp. Spacing; Vacate Order
311-2026	Phoenix Operating LLC		Well Density
312-2026	Phoenix Operating LLC		Temp. Spacing; Vacate Order
313-2026	Phoenix Operating LLC		Well Density
314-2026	Phoenix Operating LLC	Withdrawn	Temp. Spacing; Vacate Order
315-2026	Phoenix Operating LLC	Withdrawn	Well Density
316-2026	Phoenix Operating LLC	Continued	Temp. Spacing; Vacate Order
317-2026	Phoenix Operating LLC	Continued	Well Density
318-2026	Phoenix Operating LLC		Temp. Spacing; Vacate Order
319-2026	Phoenix Operating LLC		Well Density
320-2026	Hydra Services LLC		Class II Permit
321-2026	Phoenix Operating LLC		Class II Permit
322-2026	Phoenix Operating LLC		Class II Permit
323-2026	Phoenix Operating LLC		Class II Permit
324-2026	Phoenix Operating LLC		Class II Permit
325-2026	MorningStar Operating LLC		Class II Permit
310-2025	Kraken Oil & Gas LLC	Withdrawn	Temp. Spacing; Vacate Order
311-2025	Kraken Oil & Gas LLC	Withdrawn	Well Density
316-2025	Kraken Oil & Gas LLC	Continued	Temp. Spacing
51-2026	Kraken Oil & Gas LLC	Continued	APD Protest
53-2026	MorningStar Operating LLC		Spacing
54-2026	MorningStar Operating LLC		Pooling
56-2026	Devon Energy Williston, L.L.C.	Continued	Spacing
57-2026	Devon Energy Williston, L.L.C.	Continued	Pooling
70-2026	White Rock Oil & Gas, LLC	Withdrawn	Temp. Spacing; Vacate Order
71-2026	White Rock Oil & Gas, LLC	Withdrawn	Well Density
72-2026	White Rock Oil & Gas, LLC	Withdrawn	Temp. Spacing; Vacate Order
73-2026	White Rock Oil & Gas, LLC	Withdrawn	Well Density
88-2026	Kraken Oil & Gas LLC		Temp. Spacing
90-2026	Kraken Oil & Gas LLC	Continued	Temp. Spacing
91-2026	Kraken Oil & Gas LLC	Continued	Well Density
112-2026	Phoenix Operating LLC		Temp. Spacing; Vacate Order
113-2026	Phoenix Operating LLC		Well Density

114-2026	Phoenix Operating LLC		Temp. Spacing; Vacate Order
115-2026	Phoenix Operating LLC		Well Density
116-2026	Phoenix Operating LLC		Temp. Spacing; Vacate Order
117-2026	Phoenix Operating LLC		Well Density
134-2026	Phoenix Operating LLC	Continued	Temp. Spacing
135-2026	Phoenix Operating LLC	Continued	Well Density
146-2026	Phoenix Operating LLC	Continued	Temp. Spacing; Vacate Order
147-2026	Phoenix Operating LLC	Continued	Well Density
150-2026	Phoenix Operating LLC	Continued	Temp. Spacing; Vacate Order
151-2026	Phoenix Operating LLC	Continued	Well Density
152-2026	Phoenix Operating LLC	Continued	Temp. Spacing; Vacate Order
153-2026	Phoenix Operating LLC	Continued	Well Density
164-2026	Phoenix Operating LLC	Withdrawn	Temp. Spacing; Vacate Order
165-2026	Phoenix Operating LLC	Withdrawn	Well Density
170-2026	Phoenix Operating LLC		Temp. Spacing; Vacate Order
171-2026	Phoenix Operating LLC		Well Density
176-2026	Phoenix Operating LLC		Temp. Spacing
177-2026	Phoenix Operating LLC		Well Density
188-2026	Continental Resources Inc	Continued	Temp. Spacing
189-2026	Continental Resources Inc	Continued	Well Density
190-2026	Continental Resources Inc	Withdrawn	Temp. Spacing
191-2026	Continental Resources Inc	Withdrawn	Well Density
192-2026	Continental Resources Inc	Withdrawn	Temp. Spacing
193-2026	Continental Resources Inc	Withdrawn	Well Density
194-2026	Continental Resources Inc		Temp. Spacing
195-2026	Continental Resources Inc		Well Density
196-2026	Continental Resources Inc		Temp. Spacing
197-2026	Continental Resources Inc		Well Density
198-2026	Continental Resources Inc	Continued	Temp. Spacing
199-2026	Continental Resources Inc	Continued	Well Density
205-2026	MorningStar Operating LLC	Continued	Class II Permit
326-2026	Grassy Butte LLC		Show-Cause
327-2026	Montana Energy Company, LLC		Show-Cause
328-2026	Poplar Resources LLC		Show-Cause
329-2026	R.C.S. Oil, Inc.	Dismissed	Show-Cause
330-2026	Solomon Exploration Inc.	Dismissed	Show-Cause
88-2025	Coalridge Disposal & Petroleum		Show-Cause
275-2025	Yellowstone Petroleums, Inc.	Dismissed	Show-Cause
470-2025	Brainstorm Energy, Inc.		Show-Cause
472-2025	Lustre Salt Water Disp, Vernon R. Justice Db		Show-Cause

APPLICATIONS TO HEAR. 4/9/2026

(In Order of Hearing)

Docket	Applicant / Respondent	Status	Request
240-2026	Avanti Helium US, Inc.		Flare / Vent
241-2026	White Rock Oil & Gas, LLC		Spacing
242-2026	White Rock Oil & Gas, LLC		Pooling
243-2026	White Rock Oil & Gas, LLC		Spacing
244-2026	White Rock Oil & Gas, LLC		Pooling
245-2026	White Rock Oil & Gas, LLC		Spacing
246-2026	White Rock Oil & Gas, LLC		Pooling
247-2026	MorningStar Operating LLC		Temp. Spacing
248-2026	MorningStar Operating LLC		Temp. Spacing
53-2026	MorningStar Operating LLC		Spacing
54-2026	MorningStar Operating LLC		Pooling
250-2026	Whiting Oil and Gas Corporation		Temp. Spacing; Vacate Order
251-2026	Whiting Oil and Gas Corporation		Well Density
252-2026	Whiting Oil and Gas Corporation		Temp. Spacing; Vacate Order
253-2026	Whiting Oil and Gas Corporation		Well Density
254-2026	Whiting Oil and Gas Corporation		Temp. Spacing; Vacate Order
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256-2026	Whiting Oil and Gas Corporation		Temp. Spacing; Vacate Order
257-2026	Whiting Oil and Gas Corporation		Well Density
258-2026	Whiting Oil and Gas Corporation		Temp. Spacing; Vacate Order
259-2026	Whiting Oil and Gas Corporation		Well Density
260-2026	Whiting Oil and Gas Corporation		Temp. Spacing; Vacate Order
261-2026	Whiting Oil and Gas Corporation		Well Density
262-2026	Oasis Petroleum North America LLC		Temp. Spacing; Vacate Order
263-2026	Oasis Petroleum North America LLC		Well Density
264-2026	Oasis Petroleum North America LLC		Temp. Spacing
267-2026	Continental Resources Inc		Temp. Spacing; Vacate Order
268-2026	Continental Resources Inc		Well Density
269-2026	Continental Resources Inc		Temp. Spacing; Vacate Order
270-2026	Continental Resources Inc		Well Density

194-2026	Continental Resources Inc	Temp. Spacing
195-2026	Continental Resources Inc	Well Density
196-2026	Continental Resources Inc	Temp. Spacing
197-2026	Continental Resources Inc	Well Density
281-2026	Phoenix Operating LLC	Temp. Spacing; Vacate Order
282-2026	Phoenix Operating LLC	Well Density
308-2026	Phoenix Operating LLC	Temp. Spacing; Vacate Order
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177-2026	Phoenix Operating LLC	Well Density
289-2026	Kraken Oil & Gas LLC	Temp. Spacing
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292-2026	Kraken Oil & Gas LLC	Temp. Spacing
293-2026	Kraken Oil & Gas LLC	Temp. Spacing
294-2026	Kraken Oil & Gas LLC	Temp. Spacing
295-2026	Kraken Oil & Gas LLC	Temp. Spacing
88-2026	Kraken Oil & Gas LLC	Temp. Spacing

326-2026	Grassy Butte LLC		Show-Cause
327-2026	Montana Energy Company, LLC		Show-Cause
328-2026	Poplar Resources LLC		Show-Cause
88-2025	Coalridge Disposal & Petroleum		Show-Cause
470-2025	Brainstorm Energy, Inc.		Show-Cause
472-2025	Lustre Salt Water Disp, Vernon R. Justice Db		Show-Cause
275-2026	Continental Resources Inc	Protested	Temp. Spacing; Vacate Order
276-2026	Continental Resources Inc	Protested	Well Density
277-2026	Continental Resources Inc	Protested	Temp. Spacing; Vacate Order
278-2026	Continental Resources Inc	Protested	Well Density
279-2026	Phoenix Operating LLC	Protested	Temp. Spacing
280-2026	Phoenix Operating LLC	Protested	Well Density
283-2026	Phoenix Operating LLC	Protested	Temp. Spacing
284-2026	Phoenix Operating LLC	Protested	Well Density
285-2026	Phoenix Operating LLC	Protested	Temp. Spacing
286-2026	Phoenix Operating LLC	Protested	Well Density
217-2026	Phoenix Operating LLC	Protested	APD Protest
218-2026	Phoenix Operating LLC	Protested	APD Protest
230-2026	Continental Resources Inc	Protested	APD Protest
219-2026	Phoenix Operating LLC	Protested	APD Protest
226-2026	Kraken Oil & Gas LLC	Protested	APD Protest
231-2026	Phoenix Operating LLC	Protested	APD Protest
232-2026	Phoenix Operating LLC	Protested	APD Protest
235-2026	Phoenix Operating LLC	Protested	APD Protest
236-2026	Phoenix Operating LLC	Protested	APD Protest

DEFAULT DOCKET, 4/9/2026

Docket	Applicant	Status	Request
239-2026	MorningStar Operating LLC		Tax Certification
320-2026	Hydra Services LLC		Class II Permit
321-2026	Phoenix Operating LLC		Class II Permit
322-2026	Phoenix Operating LLC		Class II Permit
323-2026	Phoenix Operating LLC		Class II Permit
324-2026	Phoenix Operating LLC		Class II Permit
325-2026	MorningStar Operating LLC		Class II Permit

Inactive Wells 4/8/2026 Current Actions

EXHIBIT 8

Company Name	Total Wells SI	Status	Wells Intended for plugging 2026	Actions	Recommendations
Big Snowy Resources	7	0 Producing	1	Bottom plug set on well, coming back in Spring of 2026 to set surface.	Monitor thru Spring 2026
Reserve Operating	1	0 Producing	1	Sent 3rd Letter with deadline for response of November 6, 2025.	Operator let BOGC know Contract to plug with Liquid Gold July 2026
Pinnacle Ranch	1	0 Producing	0	Phone call with operator on 12/2/2025. Operator want to turn well on in April/May 2026. Well has not produced since 2012. No solid production since 1992 on well.	Monitor thru 2026
Pride Energy Company	5	Wells plugged	Unknown	Sent Inactive Letter Addressing Reclamation on November 1, 2024. USPS Tracking has letter moving thru network on November 16, 2024. No new USPS Update. 2nd Letter sent June 2, 2025. Cert Mail return received by BOGC on June 9, 2025.	Monitor thru 2026
R & A Oil	13	1/14 Producing 0/1 Injecting	0	2nd letter sent 6/4/2024 response received 7/1/2024.	Send letter June 2026 for update.
Paug, Gerald W	1	0 Producing	0	Inactive Letter Sent November 1, 2024. Signed Return Receipt Received November 6, 2024. Letter received from operator 1/21/2025 asking to turn well into water well within 2 to 6 years.	Monitor thru 2026
Homestake Oil & Gas Co.	10	100% Fee wells Shut-in. 5/10 wells producing.	0/5	Inactive Letter Sent November 1, 2024. USPS Tracking has letter picked up on November 7, 2024. Email received from operator November 11, 2024.	Monitor thru 2026
Montana Oil and Gas, LLC	8	8 Gas wells shut-in	0	Inactive Letter Sent November 1, 2024. Signed Return Receipt Received November 13, 2024.	BLM has shut in order with operator and will monitor that situation. Monitor thru June 2026.
BNV Energy Company LLC	2	2 wells shut-in	Unknown	Inactive Letter Sent November 1, 2024. USPS tracking has address vacant. Email notification sent via 2nd letter to last known email address due to vacant physical address 2/11/2025.	Response received 5/7/2025. The two wells in question have been shut in for more than 10 years. Monitor thru 2026.

Company Name	Total Wells SI	Status	Wells Intended for plugging 2026	Actions	Recommendations
Habets Oil & Gas, LLC	9	0 Producing	Unknown	6/11/2025 Admin Order 8-A-2025 approved by board. 6/19/2025 Admin Order 8-A-2025 sent to operator. 7/9/2025 Response from Operator son received by BOGC staff. Family is looking to transfer the wells.	Monitor thru 2026
Cypress Energy Partners - Sheridan SWD, LLC	1	0	Unknown	1 year + of no action since change of operator. 3rd and final Letter sent 10/7/2025 with December 9, 2025 deadline for response. Bond still under Cypress Energy Partners.	Response Received 12/10/2025. Secretary of State filings updated 11/7/2025 to include transferees name. Monitor thru June 2026.
Coalridge Disposal and Petroleum, Inc & Lustre Saltwater Disposal, Vernon R. Justice	4	0/1 Producing 0/2 Injecting	0	Under review with lawyers of proper ownership between family members.	Monitor situation Family in litigation.
D90 Energy LLC	146	146/198 Oil and Gas Wells shut-in	Unknown	Inactive Letter Sent November 6, 2024. USPS tracking moving through Houston, TX facility. Stuck in Houston, TX facility. Notice of filing for bankruptcy on 11/11/2024. Notice of transfer of 54 wells received by BOGC, to be heard at April 2025 hearing.	Monitor D90 Bankruptcy. Staff discussions with Production Energy Partners on ownership of remainder of wells.
Noah Energy, Inc.	5	0/4 Producing 0/1 Injecting	Unknown	Email sent on 8/22/2023. Response received 9/27/2023. Compliance Issues referenced to Billings Office for well identification signs FIXED. Contact with Investor looking to take over wells per inactivity of Noah Energy. No action in 1st Qtr 2025. Sent second letter May 6, 2025. Response received.	Previously stated in business meeting to watch through June of 2026. Recommend to Board start to take Administrative action

Total # of Wells 213

Total Wells December 2025 Meeting 213

Operators under Show Cause in 2026			
CoName	Total Wells SI	Status	Actions
Yellowstone Petroleums Inc	11/29 wells shut in 38% SI	9 wells transferred 2025	Some wells transfered some wells brought on production. Transfer of wells not complete due to bonding for UIC well. Docket Dismissed
Hesla Oil, LLC	9	0 Producing	6/11/2025 Admin Order 7-A-2025 approved by board. 6/19/2025 Admin Order 7-A-2025 sent to operator. No Response by July 10, 2025. Operator requesting to obtain wells back.

April 8, 2026

SUMMARY PAGE

RESPONDENT: Noah Energy, Inc—Teton, County, Montana

- 5 Wells
 - 4 Oil Well
 - Rockport 14-19-27-6HZ API 25-099-21320
 - Drilled in 2012 to Nisku Formation.
 - June 2023 Intent to recomplete approved June 27, 2023 in Madison Formation, never turned to production.
 - Rockport 16-19-27-6HZ API 25-099-21315
 - Drilled in 2011 to Potlatch Formation.
 - Well Acidized/Treated in 2019, never turned to production.
 - Spring Hill 13-34-27-6 API 25-099-21321
 - Drilled in 2012 to Duperow Formation.
 - Well Acidized/Treated 2019, never turned to production.
 - Spring Hill 14-34-27-6HZ API 25-099-21316
 - Drilled in 2011 to Duperow Formation.
 - Well Cleaned out in 2019 and returned to production.
 - Well produced in 15 months Since 9/30/2012
 - Well has not produced anything since 12/31/2023
 - 1 Permitted Injection well
 - Bynam North 7-34 API 25-099-21300
 - Originally, drilled to Madison as oil well in 2008.
 - Intent to convert to Water Disposal Well in 2011.
 - 0 BBLS reported for injection.
- Inactive well review
 - 1st Letter sent to operator 6/20/2023
 - 2nd Letter sent to operator 5/6/2025 (See Attached)
 - Operator has responded to both letters with phone calls and written plans.
- No Action on wells since 2023.
- Compliance action taken against operator 8/9/2024 for signs on location. Fine amount was \$25/day totaling \$650.

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



GREG GIANFORTE, GOVERNOR

OIL AND GAS CONSERVATION DIVISION

STATE OF MONTANA

May 6, 2025

Noah Energy, Inc
2669 Maddux Road
Riverton, WY 82501

Re: Plugging and abandoning well

To whom it may concern:

The Board of Oil and Gas Conservation ("BOGC") records indicate that the well on the attached list has not produced in over 1 year.

An inactive well review letter was sent on June 20, 2023, and there has been no indication of bringing the wells into production through letter dated today.

When a well is no longer capable of production, the operator has the obligation to plug and abandon the well and to restore the location, as required by ARM 36.22.1303(1).

The owner shall not permit any well drilled for oil, gas, saltwater disposal, or any other purpose to remain unplugged after such well is no longer useful for the purpose for which it was drilled or converted. When a well is no longer capable of production because the underlying reservoir or reservoirs are depleted and there is no possible future use for the well in supplemental recovery operations or for disposal facilities, the operator shall within one year plug and abandon the well as set forth in this subchapter, unless otherwise authorized by the petroleum engineer or his authorized agent.

No later than June 10, 2025, please submit to this office intents to abandon the listed well and a schedule under which the plugging and restoration will be performed. If the well has the potential for future use, please provide a request for the inapplicability of the plugging requirement and well-specific documentation to support the request.

Failure to provide the requested information will result in Noah Energy, Inc being docketed for August 13, 2025, show-cause hearing for why it should not be required to plug and abandon its wells.

Sincerely,

A handwritten signature in blue ink that reads "Benjamin Davis".

Ben Davis
Technical Program Coordinator
Benjamin.Davis@mt.gov

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

Shut-In Wells by Operator

5/6/2025
12:31:17 PM

830	A		Wells	SI	%
Noah Energy, Inc.			/ Well	5	4 80%

T1	UIC Single Well Bond	\$5,000	\$5,000.00	1	1	100%
M1	Multiple Well Bond	\$50,000	\$12,500.00	4	3	75%

SI Two to Five Years	SI Five to Ten Years	SI Greater than Ten Years	Total
0	0	4	4

830/M1	Multiple Well Bond									<i>Last Non-Zero</i>
830 M1	099-21320	Rockport 14-19-27-6HZ	27N-6W-19	SE SW	330 FSL, 2050 FWL	SI	OIL		
830 M1	099-21315	Rockport 16-19-27-6HZ	27N-6W-19	SE SE	340 FSL, 661 FEL	SI	OIL		
830 M1	099-21321	Spring Hill 13-34-27-6	27N-6W-34	SW SW	330 FSL, 660 FWL	SI	OIL		
830/T1	UIC Single Well Bond									<i>Last Non-Zero</i>
830 T1	099-21300	Bynum North 7-34	27N-6W-34	SW NE	1660 FNL, 1660 FEL	PI	OIL		

1 Operator(s) Included in Report

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

IN THE MATTER OF NOAH ENERGY, INC. INACTIVE
WELLS IN TETON COUNTY, MONTANA.

ADMINISTRATIVE ORDER 5-A-2026

Noah Energy, Inc. (Noah Energy) is the bonded operator of four producing wells and one injection well in Teton County, Montana. These wells have been inactive for two or more years.

On June 20, 2023, a certified letter was mailed to Noah Energy requesting a plan and schedule of abandonment for the inactive wells or justification with supporting documentation for leaving the inactive wells unplugged. This request was made in accordance with ARM 36.22.1307. Noah Energy requested additional time to reactivate the wells.

On May 6, 2025, a follow-up certified letter was sent. Noah Energy again requested additional time to reactivate the wells.

As of April 8, 2026, business meeting, Noah Energy has not transferred, reactivated, plugged, or filed any intents to abandon any of its inactive wells.

IT WAS THEREFORE ORDERED by the Board that Noah Energy must appear at the June 11, 2026, public hearing and show-cause, if any it has, why it should not immediately plug and abandon or transfer its inactive wells Teton County, Montana.

Dated this 8th day of April, 2026

Montana Board of Oil and Gas Conservation

Benjamin Jones, Administrator

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

IN THE MATTER OF TSAVOIL, LLC FAILURE TO MEET
THE REQUIREMENTS OF ARM 36.22.1307 and 36.22.1308
FOR THE O'CONNOR 20-34 WELL, API # 25-085-22008.

ADMINISTRATIVE ORDER 6-A-2026

TSAVOIL, LLC (TSAVOIL) was the operator of the O'Connor 20-34 well, API # 25-085-22008 located in the NE¼SE¼ of Section 20, T28N-R51E, in Roosevelt County, Montana. A well location was constructed and a conductor was set at the site.

The Board's records indicate that a bond release was processed for the well. Following that action, staff identified that the well location had not been fully reclaimed.

Staff contacted TSAVOIL regarding the outstanding reclamation obligations. TSAVOIL indicated that it would repost an appropriate bond and complete the required reclamation work. At the April 9, 2025, business meeting, staff reported to the Board that it would monitor TSAVOIL's progress.

To date, TSAVOIL has not posted a bond, has not completed reclamation of the well location, and is no longer responsive to staff communications. TSAVOIL remains responsible for reclamation of the well site notwithstanding the prior bond release.

IT WAS THEREFORE ORDERED by the Board that TSAVOIL must appear at the June 11, 2026, public hearing and show-cause, if any it has, why it should not immediately reclaim the O'Connor 20-34 well location in Roosevelt County, Montana.

Dated this 8th day of April, 2026

Montana Board of Oil and Gas Conservation

Benjamin Jones, Administrator

Colossus Operating LLC

Board Business Meeting April 8, 2026

Summary of Compliance Issues and Timeline:

Rule Violations

- ARM 36.22.1416 Mechanical Integrity
- ARM 36.22.1414 Notice of Commencement or Discontinuance – Plugging of Abandoned Wells

Fugere 3-30, T34N-R48E-30, SE NW Daniels County, Montana

- The Fugere 3-30 salt water disposal well located in Daniels County, Montana failed a mechanical integrity test on June 2, 2025.
- The 180-day deadline to plug or repair was November 29, 2025.
- Email on December 4, 2025, from operator indicated they were finalizing their budget for 2026 and would send an updated Sundry on a timeline to repair the well.
- Sundry was received on December 5, 2025, for a Notice of Intent to repair the well, with no anticipated completion date.
- March 10, 2026, a certified letter was mailed to the operator, which gave notice that the Fugere 3-30 would be discussed at the April 8, 2026, meeting. Letter was delivered on March 16, 2026.
- April 6, 2026, email was sent to operator containing scanned copy of the March 10, 2026, certified letter.
- April 8, 2026, email response from operator indicating they would be prioritizing other workover operations prior to addressing the non-compliance issue at the Fugere 3-30.

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

IN THE MATTER OF COLOSSUS OPERATING LLC
FAILURE TO MEET THE REQUIREMENTS OF ARM
36.22.1416 AND 36.22.1414 FOR THE FUGERE 3-30 WELL,
API # 25-019-21091.

ADMINISTRATIVE ORDER 7-A-2026

Colossus Operating LLC (Colossus) is the operator of the Fugere 3-30 SWD well, API # 25-019-21091, located in the SE¼NW¼ of Section 30, T34N-R48E, Daniels County, Montana.

On June 2, 2025, the Fugere 3-30 SWD well failed a mechanical integrity test (MIT). Wells that fail a MIT must be immediately shut-in until either repaired, reworked, or plugged for abandonment within 180 days, in accordance with ARM 36.22.1414, and must be successfully retested for mechanical integrity before being placed back in injection service.

On December 4, 2025, an email was received from the operator that indicated they were finalizing their 2026 budget and would send an updated sundry notice on a timeline to repair the well.

On December 5, 2025, the sundry notice was received, but no anticipated completion date was provided.

On March 10, 2026, a certified letter was sent to Colossus with an April 8, 2026, deadline to address the compliance issue, or this matter would be brought up at the Board business meeting. The letter was delivered on March 16, 2026. No response was received.

On April 6, 2026, an email was sent to Colossus with a copy of the March 10th certified letter.

On April 8, 2026, an email was received from Colossus indicating that they would be prioritizing workover operations on other wells before addressing the non-compliance issue at the Fugere 3-30 SWD well.

IT WAS THEREFORE ORDERED by the Board that failure to come into compliance by May 7, 2026, will result in Colossus being ordered to show cause at the June 11, 2026, public hearing, as to why additional penalties should not be imposed for failure to remedy the violation. Board staff has authority to dismiss the docket if Colossus achieves compliance prior to the June 11, 2026, public hearing.

Dated this 8th day of April, 2026

Montana Board of Oil and Gas Conservation

Benjamin Jones, Administrator

U Bee Tea Production LLC

Board Business Meeting April 8, 2026

Summary of Compliance Issues and Timeline:

Rule Violations

- ARM 36.22.1104 Control and Cleanup
- ARM 36.22.1105 Solid Waste

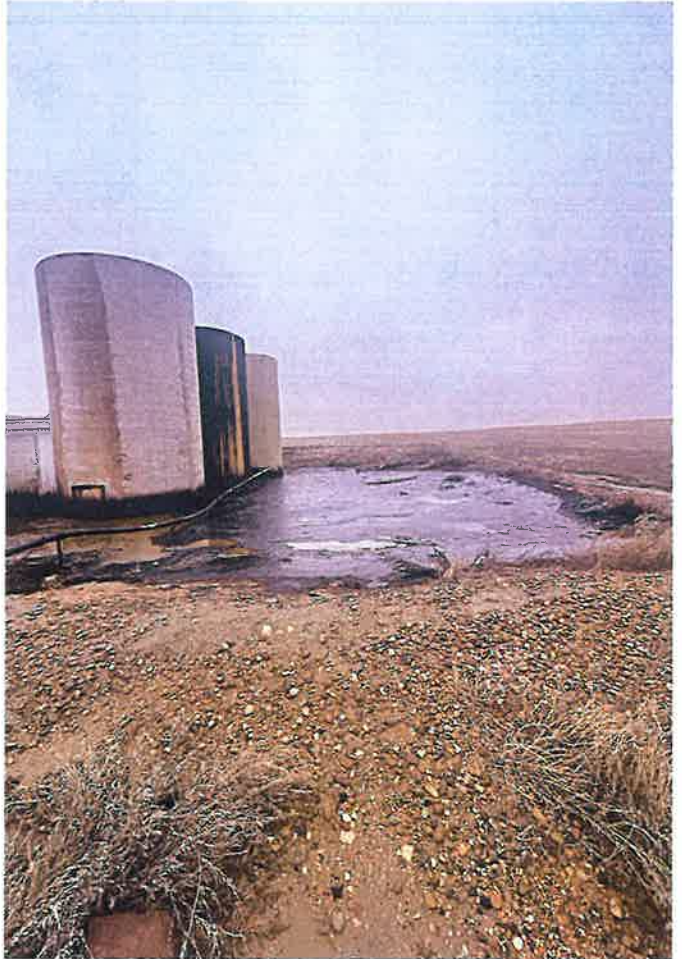
Melby 1 SWD, T34N-R58E-26 NW SW Sheridan County, Montana

- January 30, 2026, an unreported spill was discovered by field inspection, which involved the release of oil/water inside containment of pump shack and tanks.
- February 26, 2026, follow up inspection found the spill had not been remedied.
- March 18, 2026, a certified letter was sent to operator addressing field issue and April 8, 2026, deadline. Letter delivered March 23, 2026.
- April 2, 2026, inspection found the spill had not been remedied.
- April 6, operator did some cleanup.
- April 8, 2026, location not in compliance.

Morken 3-22, T34N-R58E-22 SW SW, Sheridan County, Montana

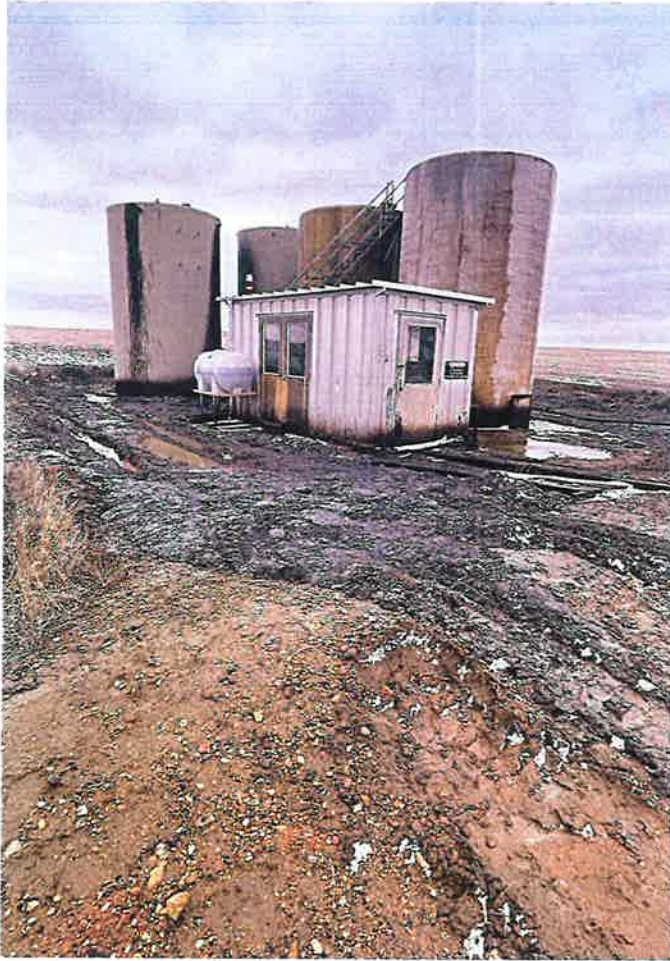
- January 30, 2026, an unreported spill was discovered by field inspection, which involved the release of oil/water inside containment of tank battery.
- February 26, 2026, follow up inspection found the spill had not been remedied, only partial cleanup had taken place.
- March 18, 2026, a certified letter was sent to operator addressing field issue and April 8, 2026, deadline. Letter delivered March 23, 2026.
- April 2, 2026, inspection found the spill had not been remedied.
- April 6, 2026, operator did some cleanup.
- April 8, 2026, location not in compliance.

12/11/26

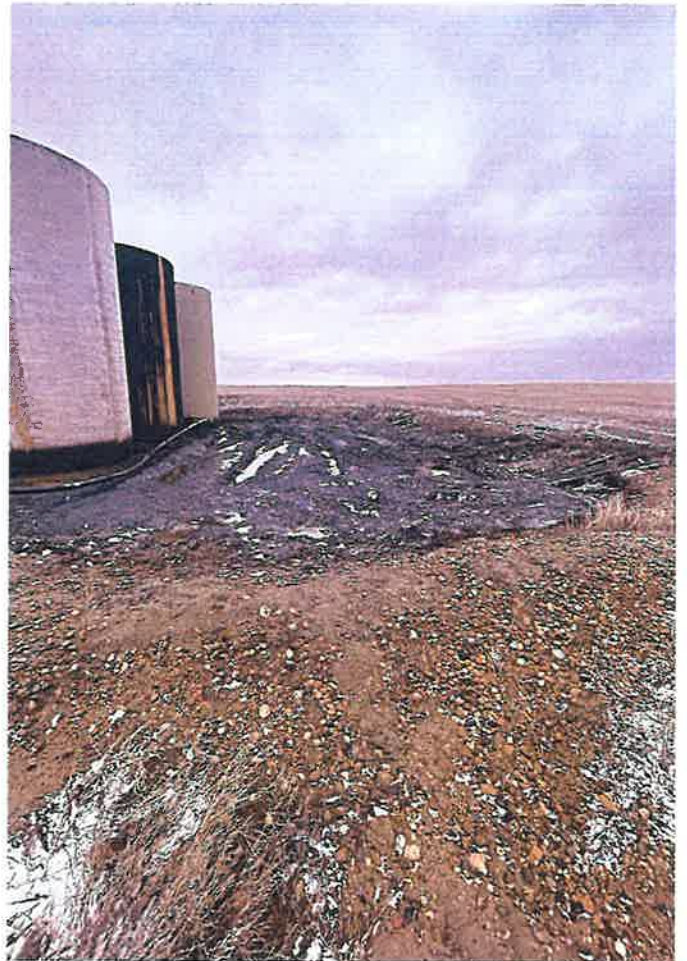


12/11/26

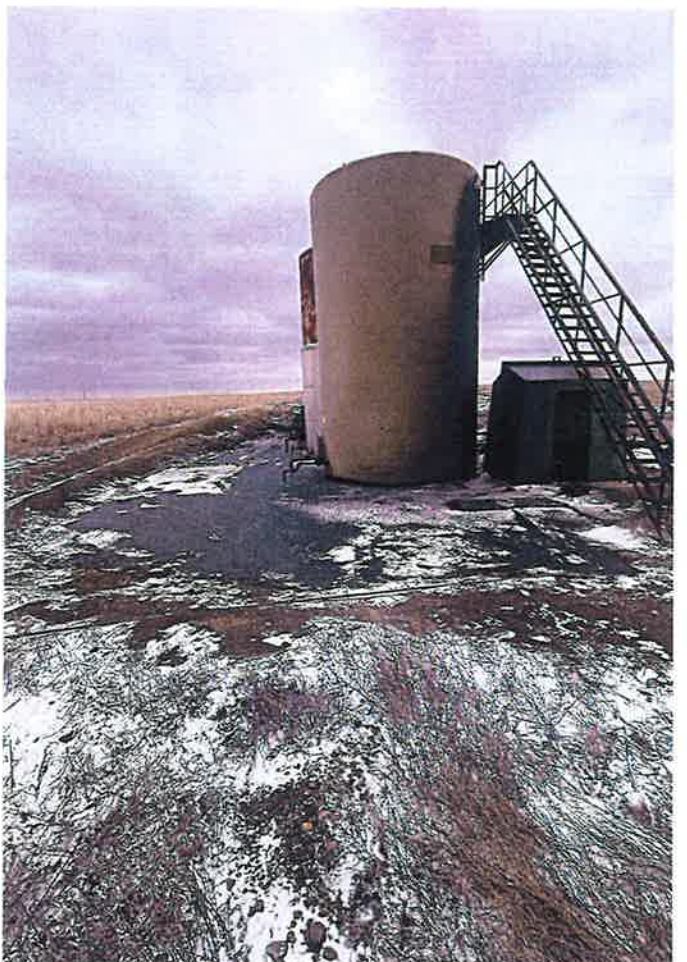




Nelby



orken



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

IN THE MATTER OF U BEE TEA PRODUCTION LLC
FAILURE TO PROPERLY MAINTAIN ITS MELBY 1 SWD
AND MORKEN 3-22 WELLSITES IN SHERIDAN COUNTY,
MONTANA.

ADMINISTRATIVE ORDER 8-A-2026

U Bee Tea Production LLC (UBT) is the bonded operator of the Melby 1 SWD well, API # 25-091-21274, located in the NW $\frac{1}{4}$ SW $\frac{1}{4}$ of Section 26, T34N-R58E and the Morken 3-22 well, API # 25-091-21423, located in the E $\frac{1}{2}$ SW $\frac{1}{4}$ SW $\frac{1}{4}$ of Section 22, T34N-R58E. Both wells are in Roosevelt County, Montana.

On January 30, 2026, a field inspector discovered an unreported spill at the Melby 1 SWD well and the Morken 3-22 well locations. That same day, UBT was notified and instructed to promptly remedy the violations.

On February 26, 2026, the field inspector again visited the well locations and observed partial cleanup at the Morken 3-22 well.

On March 18, 2026, a certified letter was sent to UBT with an April 8, 2026, deadline to address the compliance issue, or this matter would be brought up at the Board business meeting. The letter was delivered on March 23, 2026. No response was received.

As of April 8th, the compliance issue remained outstanding at both well sites.

IT WAS THEREFORE ORDERED by the Board that failure to come into compliance by May 7, 2026, will result in UBT being ordered to show cause at the June 11, 2026, public hearing, as to why additional penalties should not be imposed for failure to remedy the violations. Board staff has authority to dismiss the docket if UBT achieves compliance prior to the June 11, 2026, public hearing.

Dated this 8th day of April, 2026

Montana Board of Oil and Gas Conservation

Benjamin Jones, Administrator