

February 5, 2026

E-MAIL AND FAX

Mr. Ben Jones
Administrator
Board of Oil & Gas Conservation
State of Montana
2535 St. John's Avenue
Billings, Montana 59102-4693
Fax No. (406) 652-5305

Re: Kraken Oil & Gas LLC – Demand for Opportunity to be Heard concerning Phoenix Operating LLC's Applications for Permits to Drill.

Dear Ben:

Pursuant to A.R.M. § 36.22.601, enclosed please find three (3) Demands for Opportunity to be Heard, filed on behalf of Kraken Oil & Gas LLC and concerning twelve APDs filed by Phoenix Operating LLC. A Certificate of Service is attached to the Demands.

Please do not hesitate to call if you have questions.

Regards,



Uriah J. Price

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

REGARDING PHOENIX OPERATING LLC'S APPLICATIONS FOR PERMITS TO DRILL OIL AND GAS WELLS IN A TEMPORARY SPACING UNIT COMPRISED OF TOWNSHIP 23 NORTH, RANGE 59 EAST, SECTIONS 13, 14 & 15 AND TOWNSHIP 23 NORTH, RANGE 60 EAST, SECTIONS 17 & 18, AS PUBLISHED IN THE HELENA INDEPENDENT ON JANUARY 29, 2026

**DEMAND FOR OPPORTUNITY
TO BE HEARD CONCERNING
PHOENIX OPERATING LLC'S
APPLICATIONS FOR PERMITS
TO DRILL**

Pursuant to Montana Administrative Rule § 36.22.601, Kraken Oil & Gas LLC, 945 Bunker Hill Road, Suite 1200, Houston, Texas 77024, Phone No. (346) 739-8327 ("Kraken"), demands an opportunity to be heard concerning four (4) applications for permits to drill shown in the Notices of Intention to Apply for Permit to Drill Oil and Gas Well, published by Phoenix Operating LLC ("Phoenix") in the Helena Independent on January 29, 2026 ("Phoenix APDs"). The Phoenix APDs are for wells to be drilled within an approved temporary spacing unit established by Kraken on December 11, 2025 (Order No. 296-2025) comprised of Sections 13, 14 & 15, Township 23 North, Range 59 East and Sections 17 & 18, Township 23 North, Range 60 East ("Kraken TSU"). This demand is timely per A.R.M. § 36.22.601(6)(d). *Enclosed is a copy of Phoenix's Published Notices.*

The Phoenix APDs will impact Kraken's existing and future development plans for this area. Kraken owns working interests in the Kraken TSU and intends on developing this area along with two other laydown TSUs, which were also approved during the December 11, 2025 MBOGC hearings. Kraken owns working interests in all three of the laydown TSUs, and the Phoenix APDs would significantly impact Kraken's development plans for this area.


WHEREFORE, for the reasons above, among others, Kraken respectfully requests the following relief:

1. That the Phoenix APDs be referred to the Board for notice and public hearing as required per A.R.M. § 36.22.601(4)(a).
2. That after hearing the Board enter an Order denying Phoenix's permits.
3. For such other relief as the Board may deem appropriate.

Dated this 5th day of February, 2026.

Kraken Oil & Gas LLC

By _____


Uriah J. Price, Its Attorney

CROWLEY FLECK PLLP
1915 South 19th Avenue
P.O. Box 10969
Bozeman, MT 59719
(406) 522-4548
E-Mail: uprice@crowleyfleck.com

33 1 - 2 0 2 6

CERTIFICATE OF SERVICE

I, URIAH J. PRICE, in accordance with A.R.M. § 36.22.601(6)(e), hereby certify that the foregoing demand for opportunity to be heard was served on this 5th day of February, 2026 on the following:

By FAX to:

Mr. Ben Jones
Administrator
Board of Oil & Gas Conservation
2535 St. Johns Avenue
Billings, MT 59102
Fax No. (406) 652-5305

*With a copy sent via electronic mail to
Mr. Ben Jones at: bjones@mt.gov*

By Certified Mail to:

Phoenix Operating LLC
4643 S Ulster, Ste 1510
Denver, CO 80237

*With a copy sent via electronic mail to
Phoenix's legal counsel at: don@leelawofficepc.com & wjohnson@kmd.law*

By:  _____
Uriah J. Price

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

FORMAT FOR ADVERTISING AN APPLICATION FOR
PERMIT TO DRILL AN OIL AND GAS WELL REQUIRED BY
ARM 36.22.601

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

In the Matter of the application of
BAILIAN 15-14-13-18-17 1H by Phoenix Operating LLC=
for a Permit to Drill an oil and gas well.

1. Name and address of Applicant:

Phoenix Operating LLC
4643 S Ulster, Ste 1510
Denver, CO 80237

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

Surface Location at 2596' FNL and 500' FWL in SWNW,
Section 15, Township 23 North, Range 59 East, Richland
County, Montana.

Bottom Hole Location at 550' FNL and 240' FEL in Lot 1,
Section 17, Township 23 North, Range 60 East, Richland
County, Montana.

3. Total Depth Proposed to be Drilled:

34549' Measured Depth, 10158' Total Vertical Depth

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

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

Billings MT 59102
Office: (406) 656-0040

Fax: (406) 655-6015

January 29, 2026 COL-MT-202110 MNAXLP

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

FORMAT FOR ADVERTISING AN APPLICATION FOR
PERMIT TO DRILL AN OIL AND GAS WELL REQUIRED BY
ARM 36.22.601
BEFORE THE BOARD OF OIL AND GAS CONSERVATION
OF THE STATE OF MONTANA

In the Matter of the application of
BAILIAN 15-14-13-18-17 2H by Phoenix Operating LLC=
for a Permit to Drill an oil and gas well.

1. Name and address of Applicant:

Phoenix Operating LLC
4643 S Ulster, Ste 1510
Denver, CO 80237

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

Surface Location at 2626' FNL and 500' FWL in SWNW,
Section 15, Township 23 North, Range 59 East, Richland
County, Montana.

Bottom Hole Location at 1945' FNL and 240' FEL in Lot 5,
Section 17, Township 23 North, Range 60 East, Richland
County, Montana.

3. Total Depth Proposed to be Drilled:

34261' Measured Depth, 10158' Total Vertical Depth

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

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

Billings MT 59102
Office: (406) 656-0040

Fax: (406) 655-6015

January 29, 2026 COL-MT-202109 MNAXLP

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

FORMAT FOR ADVERTISING AN APPLICATION FOR
PERMIT TO DRILL AN OIL AND GAS WELL REQUIRED BY
ARM 36.22.601

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

In the Matter of the application of

BAILIAN 15-14-13-18-17 3H by Phoenix Operating LLC
for a Permit to Drill an oil and gas well.

1. Name and address of Applicant:

Phoenix Operating LLC
4643 S Ulster, Ste 1510
Denver, CO 80237

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

Surface Location at 2647' FSL and 500' FWL in NWSW,
Section 15, Township 23 North, Range 59 East, Richland
County, Montana.

Bottom Hole Location at 1945' FSL and 240' FEL in Lot 6,
Section 17, Township 23 North, Range 60 East, Richland
County, Montana.

3. Total Depth Proposed to be Drilled:

34243' Measured Depth, 10158' Total Vertical Depth

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

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

Billings MT 59102
Office: (406) 656-0040
Fax: (406) 655-6015

January 29, 2026 COL-MT-202106 MNAXLP

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

FORMAT FOR ADVERTISING AN APPLICATION FOR
PERMIT TO DRILL AN OIL AND GAS WELL REQUIRED BY
ARM 36.22.601

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

In the Matter of the application of

BAILIAN 15-14-13-18-17 4H by Phoenix Operating LLC
for a Permit to Drill an oil and gas well.

1. Name and address of Applicant:

Phoenix Operating LLC
4643 S Ulster, Ste 1510
Denver, CO 80237

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

Surface Location at 2617' FSL and 500' FWL in NWSW,
Section 15, Township 23 North, Range 59 East, Richland
County, Montana.

Bottom Hole Location at 550' FSL and 240' FEL in Lot 7,
Section 17, Township 23 North, Range 60 East, Richland
County, Montana.

3. Total Depth Proposed to be Drilled:

34516' Measured Depth, 10158' Total Vertical Depth

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

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

Billings MT 59102
Office: (406) 656-0040
Fax: (406) 655-6015

January 29, 2026 COL-MT-202107 MNAXLP

Published in Helena Independent Record on February 7, 2026

Location

Lewis and Clark County, Montana

Notice Text

APPLICATION FOR PERMIT TO DRILL AN OIL AND GAS WELL
BEFORE THE BOARD OF OIL AND GAS CONSERVATION OF THE STATE OF
MONTANA

In the Matter of the application of
BAILIAN 15-14-13-18-17 1H
by **Phoenix Operating LLC**

for a Permit to Drill an oil and gas well.

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

1. Name and address of Applicant:

Phoenix Operating LLC
4643 S Ulster, Ste 1510
Denver, CO 80237

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

Surface Location at 2477' FNL and 450' FWL in SWNW,
Section 15, Township 23 North, Range 59 East, Richland County,
Montana.

Bottom Hole Location at 550' FNL and 240' FEL in Lot 1,
Section 17, Township 23 North, Range 60 East, Richland County,
Montana.

3. Total Depth Proposed to be Drilled:

34508' Measured Depth, 10158' Total Vertical Depth

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

Montana Board of Oil and Gas Conservation 2535 St. Johns Avenue
Billings MT 59102
Office: (406) 656-0040
Fax: (406) 655-6015

February 7, 2026 COL-MT-202142 MNAXLP

331-2026

Published in Helena Independent Record on February 7, 2026

Location

Lewis and Clark County, Montana

Notice Text

APPLICATION FOR PERMIT TO DRILL AN OIL AND GAS WELL
BEFORE THE BOARD OF OIL AND GAS CONSERVATION OF THE STATE OF
MONTANA

In the Matter of the application of

BAILIAN 15-14-13-18-17 2H

by **Phoenix Operating LLC**

for a Permit to Drill an oil and gas well.

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

1. Name and address of Applicant:

Phoenix Operating LLC

4643 S Ulster, Ste 1510

Denver, CO 80237

2. Legal Description including County and Approximate Footages of
Surface Location of Proposed Oil and Gas Well

(and projected bottom-hole location, if a directional or horizontal well)

Surface Location at 2507' FNL and 450' FWL in SWNW,

**Section 15, Township 23 North, Range 59 East, Richland County,
Montana.**

Bottom Hole Location at 1945' FNL and 240' FEL in Lot 5,

**Section 17, Township 23 North, Range 60 East, Richland County,
Montana.**

3. Total Depth Proposed to be Drilled:

34244' Measured Depth, 10158' Total Vertical Depth

Notice is hereby given that an application for permit to drill an oil and gas well at the surface location set forth above to the depth as stated will be filed with the Montana Board of Oil and Gas Conservation. Pursuant to Rules 36.22.001 and 36.22.004, Administrative Rules of Montana, an interested party may demand an opportunity to be heard by the Montana Board of Oil and Gas Conservation concerning the application. SUCH DEMAND FOR HEARING MUST BE RECEIVED BY THE MONTANA BOARD OF OIL AND GAS CONSERVATION AT THE ADDRESS SET FORTH BELOW NO LATER THAN TEN (10) DAYS AFTER THE DATE OF PUBLICATION OF THIS NOTICE, OR THE APPLICATION WILL BE ACTED UPON BY THE BOARD'S PETROLEUM ENGINEER WITHOUT HEARING. A DEMAND MUST: (1) SET FORTH THE NAME, ADDRESS AND TELEPHONE NUMBER OF EACH INTERESTED PARTY, THEIR OWNERSHIP INTEREST IN THE LANDS SURROUNDING THE PROPOSED WELL, AND THE REASONS WHY A HEARING IS SOUGHT; (2) BE SERVED UPON THE APPLICANT BY COPY MAILED OR FAX TRANSMITTED TO THE ADDRESS SET FORTH ABOVE.

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

Billings MT 59102

Office: (406) 656-0040

Fax: (406) 655-6015

February 7, 2026 COL-MT-202138 MNAXLP

331-2026

Published in Helena Independent Record on February 7, 2026

Location

Lewis and Clark County, Montana

Notice Text

APPLICATION FOR PERMIT TO DRILL AN OIL AND GAS WELL
BEFORE THE BOARD OF OIL AND GAS CONSERVATION OF THE STATE OF
MONTANA

In the Matter of the application of

BAILIAN 15-14-13-18-17 3H

by **Phoenix Operating LLC**

for a Permit to Drill an oil and gas well

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

1. Name and address of Applicant:

Phoenix Operating LLC
4643 S Ulster, Ste 1510
Denver, CO 80237

2. Legal Description including County and Approximate Footages of
Surface Location of Proposed Oil and Gas Well

(and projected bottom-hole location, if a directional or horizontal well):

**Surface Location at 2537' FNL and 450' FWL in SWNW,
Section 15, Township 23 North, Range 59 East, Richland County,
Montana.**

**Bottom Hole Location at 1945' FSL and 240' FEL in Lot 6,
Section 17, Township 23 North, Range 60 East, Richland County,
Montana.**

3. Total Depth Proposed to be Drilled:

34251' Measured Depth, 10158' Total Vertical Depth

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

Montana Board of Oil and Gas Conservation 2535 St. Johns Avenue
Billings MT 59102
Office: (406) 656-0040
Fax: (406) 655-6015

February 7, 2026 COL-MT-202139 MNAXLP

331-2026

Published in Helena Independent Record on February 7, 2026

Location

Lewis and Clark County, Montana

Notice Text

APPLICATION FOR PERMIT TO DRILL AN OIL AND GAS WELL
BEFORE THE BOARD OF OIL AND GAS CONSERVATION OF THE STATE OF
MONTANA

In the Matter of the application of
BAILIAN 15-14-13-18-17 4H
by **Phoenix Operating LLC**

for a Permit to Drill an oil and gas well.

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

1. Name and address of Applicant:

Phoenix Operating LLC
4643 S Ulster, Ste 1510
Denver, CO 80237

2. Legal Description including County and Approximate Footages of
Surface Location of Proposed Oil and Gas Well:
(and projected bottom-hole location, if a directional or horizontal well)
Surface Location at 2567' FNL and 450' FWL in SWNW,
Section 15, Township 23 North, Range 59 East, Richland County,
Montana.

Bottom Hole Location at 550' FSL and 240' FEL in Lot 7,
Section 17, Township 23 North, Range 60 East, Richland County,
Montana.

3. Total Depth Proposed to be Drilled:

34548' Measured Depth, 10158' Total Vertical Depth

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

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

Office: (406) 656-0040

Fax: (406) 655-6015

February 7, 2026 COL-MT-202141 MNAXLP

FAX COVER SHEET

TO	Ben Jones
COMPANY	Board of Oil & Gas Conservation - State of Montana
FAX NUMBER	14066525305
FROM	Anna Barbati
DATE	2026-03-17 22:13:44 GMT
RE	RE: Phoenix Operating LLC - Demands for Opportunity to be Heard Concerning Oasis Petroleum North America LLC Applications for Permits to Drill

COVER MESSAGE

Dear Mr. Jones,

Please see the packet regarding two (2) Demands for Opportunity to be Heard, filed on behalf of Phoenix Operating LLC, concerning five (5) APDs filed by Oasis Petroleum North America LLC.

Thanks,
Anna Barbati
Legal Assistant to Kelley Lewis
KLH Advisors PLLC
anna@klhadvisors.com
406-577-2119

RECEIVED

MAR 17 2026

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

332 - 2026



*Legal clarity. Thoughtful strategy.
Every step of the way.*

March 17, 2026

E-MAIL AND FAX

Mr. Ben Jones
Administrator
Board of Oil & Gas Conservation
State of Montana
2535 St. John's Avenue
Billings, Montana 59102-4693
Fax No. (406)-652-5305

RE: Phoenix Operating LLC – Demands for Opportunity to be Heard concerning Oasis Petroleum North America LLC Applications for Permits to Drill.

Dear Mr. Jones:

Pursuant to A.R.M. § 36.22.601, enclosed please find two (2) Demands for Opportunity to be Heard, filed on behalf of Phoenix Operating LLC, concerning five (5) APDs filed by Oasis Petroleum North America LLC. A Certificate of Service is attached to the Demands.

Please do not hesitate to call if you have questions.

Sincerely,

Kelley Huemoeller Lewis

Kelley Lewis

RECEIVED

MAR 17 2026

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

1940 West Dickerson Street, Suite 206 | Bozeman, Montana 59718
(406) 577-2119 | www.klhadvisors.com



332-2026

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

<p>REGARDING OASIS PETROLEUM NORTH AMERICA LLC'S APPLICATIONS FOR PERMITS TO DRILL OIL AND GAS WELL AUGUSTA 2958 24- 11 5B, COMPRISED OF SECTIONS 2, 3, 4, 5, TOWNSHIP 29 NORTH, RANGE 58 EAST, ROOSEVELT COUNTY, MONTANA, AS PUBLISHED IN THE HELENA INDEPENDENT ON MARCH 7, 2026.</p>	<p>DEMAND FOR OPPORTUNITY TO BE HEARD CONCERNING OASIS PETROLEUM NORTH AMERICA'S APPLICATIONS FOR PERMITS TO DRILL</p>
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Pursuant to Montana Administrative Rule § 36.22.601, Phoenix Operating LLC, South Ulster Street, Suite 1510, Denver, Colorado, 80237, Phone No. (303) 749-0074 ("Phoenix"), demands an opportunity to be heard concerning applications for permits to drill shown in the Notices of Intention to Apply for Permit to Drill Oil and Gas Well, published by Oasis Petroleum North America LLC ("Oasis") in the Helena Independent on March 7, 2026 ("Oasis APD"). The Oasis APD is for one (1) well to be drilled within an overlapping temporary spacing unit comprised of Sections 2, 3, 4, and 5, Township 29 North, Range 58 East, Roosevelt County, Montana. This demand is timely per A.R.M. § 36.22.601(6)(d). *Enclosed are copies of Oasis's published notice with the applicable well name.*

1. The Montana Board of Oil and Gas Conservation ("MBOGC" and the "Board") established an overlapping temporary spacing unit comprised of Sections 2, 3, 4, and 5, Township 29 North, Range 58 East, Roosevelt County, Montana, under MBOGC Order No. 184-2025 ("OTSU").
2. Phoenix was the first operator to file a completed application for permit to drill within the OTSU ("Phoenix APD") pursuant to the Board's regulations, and published notice of the Phoenix APD in the Helena Independent on February 21, 2026, and in the Northern Plains Independent on February 26, 2026. The notice and filing for Oasis's APD are administratively deficient by comparison.
3. To the extent that the MBOGC examines other factors in determining operatorship, Phoenix owns 36.42% of the working interest in Sections 2, 3, 4, and 5, Township 29 North, Range 58 East. Phoenix plans to develop the underlying pool in an orderly manner alongside other development in the area. Oasis's APD fails to adequately provide for correlative rights or promote maximum efficient recovery of oil and gas in the State of Montana.

RECEIVED

MAR 17 2026

Accordingly, for the foregoing reasons, among others, denying the Oasis APD is consistent with the Board's prior decisions and regulations and will ensure that the OTSU is developed in a manner that promotes maximum efficient recovery, protects correlative rights, and prevents waste.

WHEREFORE, Phoenix respectfully requests the following relief:

1. That the Oasis APD be referred to the MBOGC for notice and public hearing as required by A.R.M. § 36.22.601(4)(a);
2. That after hearing the MBOGC enter an Order denying Oasis's APD, and
3. For such other relief as the MBOGC may deem appropriate.

DATED this 17th day of March 2026.

PHOENIX OPERATING LLC

By Kelley Huasmoeller Lewis
Kelley Lewis, Attorney for Applicant
KLH Advisors PLLC
1940 West Dickerson Street, Suite 206
Bozeman, MT 59718
Telephone: (406) 577-2119
Email: klh@klhadvisors.com

RECEIVED

MAR 17 2026

CERTIFICATE OF SERVICE

I, Kelley Huemoeller Lewis, in accordance with A.R.M. § 36.22.601(6)(e), hereby certify that the foregoing demand for opportunity to be heard was served on this 17th day of March, 2026, addressed to the following:

Mr. Ben Jones
Administrator
Montana Board of Oil and Gas Conservation
2535 St. Johns Avenue
Billings, MT 59102
Fax No. (406) 652-5305

Via Fax, with a copy sent via electronic mail to bjones@mt.gov.

Oasis Petroleum North America LLC
1001 Fannin Street, Suite 1500
Houston, TX 77002
Fax No. (281) 404-9501

Via Fax, with a copy sent via certified mail.

By *Kelley Huemoeller Lewis*
Kelley Lewis, Attorney for Applicant
KLH Advisors PLLC
1940 West Dickerson Street, Suite 206
Bozeman, MT 59718
Telephone: (406) 577-2119
Email: klh@klhadvisors.com

RECEIVED

MAR 17 2026

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

Notice of Application

Published in Helena Independent Record on March 7, 2026

Location

Lewis and Clark County, Montana

Notice Text

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

In the Matter of the application of

AUGUSTA 2958 24-11 5B

OASIS PETROLEUM NORTH AMERICA LLC

for a Permit to Drill an oil and gas well.

NOTICE OF INTENTION TO APPLY

FOR PERMIT TO DRILL

OIL AND GAS WELL

Name and address of Applicant:

OASIS PETROLEUM NORTH AMERICA LLC

1001 FANNIN STREET, SUITE 1500

HOUSTON, TX 77002

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

ROOSEVELT COUNTY, MT

SHL: 1602' FNL 475' FEL, Sec. 11 T29N R58E

BHL: 676' FSL 220' FWL, Sec. 5 T29N R58E

Total Depth Proposed to be Drilled:

31713' MD, 10390' TVD

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

Montana Board of Oil and Gas Conservation

2535 St. Johns Avenue

Billings MT 59102

Office: (406) 656-0040

Fax: (406) 652-5305

March 7, 2026 CQL-MT-202338 MNAXLP

RECEIVED

MAR 17 2026

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

332-2026

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

<p>REGARDING OASIS PETROLEUM NORTH AMERICA LLC'S APPLICATIONS FOR PERMITS TO DRILL OIL AND GAS WELLS PINEHURST 2958 24-11 2B, 3B, 4B, AND 5B, COMPRISED OF SECTIONS 8, 9, 10, AND 11, TOWNSHIP 29 NORTH, RANGE 58 EAST, ROOSEVELT COUNTY, MONTANA AS PUBLISHED IN THE HELENA INDEPENDENT ON MARCH 7, 2026.</p>	<p>DEMAND FOR OPPORTUNITY TO BE HEARD CONCERNING OASIS PETROLEUM NORTH AMERICA'S APPLICATIONS FOR PERMITS TO DRILL</p>
--	---

Pursuant to Montana Administrative Rule § 36.22.601, Phoenix Operating LLC, South Ulster Street, Suite 1510, Denver, Colorado, 80237, Phone No. (303) 749-0074 ("Phoenix"), demands an opportunity to be heard concerning applications for permits to drill shown in the Notices of Intention to Apply for Permit to Drill Oil and Gas Well, published by Oasis Petroleum North America LLC ("Oasis") in the Helena Independent on March 7, 2026 (together, "Oasis APDs"). The Oasis APDs are for five (5) wells to be drilled within an overlapping temporary spacing unit comprised of Sections 8, 9, 10, and 11, Township 29 North, Range 58 East, Roosevelt County, Montana. This demand is timely per A.R.M. § 36.22.601(6)(d). *Enclosed are copies of Oasis's published notices with the applicable well names.*

1. The Montana Board of Oil and Gas Conservation ("MBOGC" and the "Board") established an overlapping temporary spacing unit comprised of Sections 8, 9, 10, and 11, Township 29 North, Range 58 East, Roosevelt County, Montana, under MBOGC Order No. 186-2025 ("OTSU").
2. Phoenix was the first operator to file a completed application for permit to drill within the OTSU ("Phoenix APD") pursuant to the Board's regulations, and published notice of the Phoenix APD in the Helena Independent on February 21, 2026, and in the Northern Plains Independent on February 26, 2026. The notice and filing for Oasis's APDs are administratively deficient by comparison.
3. To the extent the MBOGC examines other factors to determine operatorship, Phoenix owns 27.7385% of the working interest in Sections 8, 9, 10, and 11, Township 29 North, Range 58 East. Phoenix plans to develop the underlying pool in an orderly manner alongside other development in the area. The notice for Oasis's APD by comparison is administratively deficient, and Oasis's APD plan fails to adequately provide for correlative rights or promote maximum efficient recovery of oil and gas in the State of Montana.

Accordingly, for the foregoing reasons, among others, denying the Oasis APDs is consistent with the Board's prior decisions and regulations and will ensure that the OTSU is developed in a manner that promotes maximum efficient recovery, protects correlative rights, and prevents waste.

WHEREFORE, Phoenix respectfully requests the following relief:

1. That the Oasis APDs be referred to the MBOGC for notice and public hearing as required per A.R.M. § 36.22.601(4)(a);
2. That after hearing the MBOGC enter an Order denying Oasis's APDs, and
3. For such other relief as the MBOGC may deem appropriate.

DATED this 17th day of March 2026.

PHOENIX OPERATING LLC

By *Kelley Huemoeller Lewis*
Kelley Lewis, Attorney for Applicant
KLH Advisors PLLC
1940 West Dickerson Street, Suite 206
Bozeman, MT 59718
Telephone: (406) 577-2119
Email: klh@klhadvisors.com

RECEIVED

MAR 17 2026

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

CERTIFICATE OF SERVICE

I, Kelley Huemoeller Lewis, in accordance with A.R.M. § 36.22.601(6)(e), hereby certify that the foregoing demand for opportunity to be heard was served on this 17th day of March, 2026, addressed to the following:

Mr. Ben Jones
Administrator
Montana Board of Oil and Gas Conservation
2535 St. Johns Avenue
Billings, MT 59102
Fax No. (406) 652-5305
Via Fax, with a copy sent via electronic mail to bjones@mt.gov.

Oasis Petroleum North America LLC
1001 Fannin Street, Suite 1500
Houston, TX 77002
Fax No. (281) 404-9501
Via Fax, with a copy sent via certified mail.

By *Kelley Huemoeller Lewis*
Kelley Lewis, Attorney for Applicant
KLH Advisors PLLC
1940 West Dickerson Street, Suite 206
Bozeman, MT 59718
Telephone: (406) 577-2119
Email: klh@klhadvisors.com

RECEIVED

MAR 17 2026

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

Notice of Application

Published in Helena Independent Record on March 7, 2026

Location

Lewis and Clark County, Montana

Notice Text

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

In the Matter of the application of

PINEHURST 2958 24-11 2B

OASIS PETROLEUM NORTH AMERICA LLC

for a Permit to Drill an oil and gas well.

NOTICE OF INTENTION TO APPLY

FOR PERMIT TO DRILL

OIL AND GAS WELL

Name and address of Applicant:

OASIS PETROLEUM NORTH AMERICA LLC

1001 FANNIN STREET, SUITE 1500

HOUSTON, TX 77002

Legal Description including County and Approximate Footages of Surface

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

ROOSEVELT COUNTY, MT

SHL: 1635' FNL 471' FEL, Sec. 11 T29N R58E

BHL: 676' FNL 220' FWL, Sec. 8 T29N R58E

Total Depth Proposed to be Drilled:

31418' MD, 10370' TVD

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

Montana Board of Oil and Gas Conservation

2535 St. Johns Avenue

Billings MT 59102

Office: (406) 656-0040

Fax: (406) 652-5305

March 7, 2026 COL-MT-202332 MNAXLP

RECEIVED

MAR 17 2026

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

333-2026

Notice of Application

Published in Helena Independent Record on March 7, 2026

Location

Lewis and Clark County, Montana

Notice Text

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

In the Matter of the application of

PINEHURST 2958 24-11 3B

OASIS PETROLEUM NORTH AMERICA LLC

for a Permit to Drill an oil and gas well,

NOTICE OF INTENTION TO APPLY

FOR PERMIT TO DRILL

OIL AND GAS WELL

Name and address of Applicant:

OASIS PETROLEUM NORTH AMERICA LLC

1001 FANNIN STREET, SUITE 1500

HOUSTON, TX 77002

Legal Description including County and Approximate Footages of Surface

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

ROOSEVELT COUNTY, MT

SHL: 1668' FNL 466' FEL, Sec. 11 T29N R58E

BHL: 2028' FNL 220' FWL, Sec. 8 T29N R58E

Total Depth Proposed to be Drilled:

31345' MD, 10347' TVD

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

Montana Board of Oil and Gas Conservation

2535 St. Johns Avenue

Billings MT 59102

Office: (406) 656-0040

Fax: (406) 652-5305

March 7, 2026 COL-MT-202339 MNAXLP

RECEIVED

MAR 17 2026

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

333-2026

Notice of Application

Published in Helena Independent Record on March 7, 2026

Location

Lewis and Clark County, Montana

Notice Text

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

In the Matter of the application of

PINEHURST 2958 24-11 4B

OASIS PETROLEUM NORTH AMERICA LLC

for a Permit to Drill an oil and gas well.

NOTICE OF INTENTION TO APPLY

FOR PERMIT TO DRILL

OIL AND GAS WELL

Name and address of Applicant:

OASIS PETROLEUM NORTH AMERICA LLC

1001 FANNIN STREET, SUITE 1500

HOUSTON, TX 77002

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

ROOSEVELT COUNTY, MT

SHL: 1700' FNL 462' FEL, Sec. 11 T29N R58E

BHL: 1902' FSL 220' FWL, Sec. 8 T29N R58E

Total Depth Proposed to be Drilled:

31497' MD, 10325' TVD

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

Montana Board of Oil and Gas Conservation

2535 St. Johns Avenue

Billings MT 59102

Office: (406) 656-0040

Fax: (406) 652-5305

March 7, 2026 CQL-MT-202340 MNAXLP

RECEIVED

MAR 17 2026

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

333-2026

Notice of Application

Published in Helena Independent Record on March 7, 2026

Location

Lewis and Clark County, Montana

Notice Text

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

In the Matter of the application of

PINEHURST 2958 24-11 5B

OASIS PETROLEUM NORTH AMERICA LLC

for a Permit to Drill an oil and gas well.

NOTICE OF INTENTION TO APPLY

FOR PERMIT TO DRILL

OIL AND GAS WELL.

Name and address of Applicant:

OASIS PETROLEUM NORTH AMERICA LLC

1001 FANNIN STREET, SUITE 1500

HOUSTON, TX 77002

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

ROOSEVELT COUNTY, MT

SHL: 1733' FNL 458' FEL, Sec. 11 T29N R58E

BHL: 550' FSL 220' FWL, Sec. 8 T29N R58E

Total Depth Proposed to be Drilled:

31881' MD, 10308' TVD

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

Montana Board of Oil and Gas Conservation

2535 St. Johns Avenue

Billings MT 59102

Office: (406) 656-0040

Fax: (406) 652-5305

March 7, 2026 COL-MT-202333 MNAXLP

RECEIVED

MAR 17 2026

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

333-2026

CROWLEY | FLECK
ATTORNEYS

Uriah J. Price
1915 South 19th Avenue
P. O. Box 10969
Bozeman, MT 59719
uprice@crowleyfleck.com
(406) 522-4548

March 23, 2026

E-MAIL AND FAX

Mr. Ben Jones
Administrator
Board of Oil & Gas Conservation
State of Montana
2535 St. John's Avenue
Billings, Montana 59102-4693
Fax No. (406) 652-5305

Re: Kraken Oil & Gas LLC – Demand for Opportunity to be Heard concerning Phoenix
Operating LLC's Applications for Permits to Drill.

Dear Ben:

Pursuant to A.R.M. § 36.22.601, enclosed please find one (1) Demand for Opportunity to be Heard, filed on behalf of Kraken Oil & Gas LLC and concerning four APDs filed by Phoenix Operating LLC. A Certificate of Service is attached to the Demands.

Please do not hesitate to call if you have questions.

Regards,



Uriah J. Price

RECEIVED

MAR 23 2026

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



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

REGARDING PHOENIX OPERATING LLC'S APPLICATIONS FOR PERMITS TO DRILL OIL AND GAS WELLS IN A TEMPORARY SPACING UNIT COMPRISED OF TOWNSHIP 26 NORTH, RANGE 58 EAST, SECTIONS 18, 19 & 30, AS PUBLISHED IN THE HELENA INDEPENDENT ON MARCH 19, 2026

DEMAND FOR OPPORTUNITY TO BE HEARD CONCERNING PHOENIX OPERATING LLC'S APPLICATIONS FOR PERMITS TO DRILL

Pursuant to Montana Administrative Rule § 36.22.601, Kraken Oil & Gas LLC, 945 Bunker Hill Road, Suite 1200, Houston, Texas 77024, Phone No. (346) 739-8327 ("Kraken"), demands an opportunity to be heard concerning applications for permits to drill shown in the Notices of Intention to Apply for Permit to Drill Oil and Gas Well, published by Phoenix Operating LLC ("Phoenix") in the Helena Independent on March 19, 2026 ("Phoenix APDs"). The Phoenix APDs are for four (4) wells to be drilled within a temporary spacing unit comprised of Sections 18, 19 & 30, Township 26 North, Range 58 East ("TSU"). This demand is timely per A.R.M. § 36.22.601(6)(d). *Enclosed is a copy of Phoenix's Published Notice with the applicable well name(s).*

The TSU was approved in December 2025 (Order No. 344-2025). Kraken filed its Application for Permit to Drill a well in the TSU ("Kraken's APD") and notice was properly published in the Helena Independent on December 27, 2025, in accordance with the Board's regulations. Continental protested Kraken's APD and the parties agreed to continue the protest to allow them time to reach an agreement.

On March 19, 2026, nearly three months after Kraken, Phoenix published notice of the Phoenix APDs in the Helena Independent newspaper. Kraken is the first to file a fully completed application pursuant to the Board's regulations, and believes it has more interest in the TSU than Phoenix. Further, Kraken operates multiple wells in this area and has the infrastructure to orderly develop in compliance with the Board's statutory mandates. Accordingly, for the reasons herein among others, denying the Phoenix APDs will be in accordance with the Board's prior decisions and regulations, and will also ensure that the TSU will be developed in an orderly manner that promotes maximum efficient recovery, protects correlative rights and prevents waste.

WHEREFORE, Kraken respectfully requests the following relief:

1. That the Phoenix APDs be referred to the Board for notice and public hearing as required per A.R.M. § 36.22.601(4)(a).
2. That after hearing the Board enter an Order denying Phoenix's permits.
3. For such other relief as the Board may deem appropriate.

Dated this 23rd day of March, 2026.


RECEIVED

MAR 23 2026

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

334-2026

Kraken Oil & Gas LLC

By 
Ujah J. Price, Its Attorney

CROWLEY FLECK PLLP
1915 South 19th Avenue
P.O. Box 10969
Bozeman, MT 59719
(406) 522-4548
E-Mail: uprice@crowleyfleck.com

RECEIVED

MAR 23 2026

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

334 - 2026

CERTIFICATE OF SERVICE

I, URIAH J. PRICE, in accordance with A.R.M. § 36.22.601(6)(e), hereby certify that the foregoing demand for opportunity to be heard was served on this 23rd day of March, 2026 on the following:

By FAX to:

Mr. Ben Jones
Administrator
Board of Oil & Gas Conservation
2535 St. Johns Avenue
Billings, MT 59102
Fax No. (406) 652-5305

*With a copy sent via electronic mail to
Mr. Ben Jones at: bjones@mt.gov*

By Certified Mail to:

Phoenix Operating LLC
4643 S Ulster, Ste 1510
Denver, CO 80237

*With a copy sent via electronic mail to
Phoenix's legal counsel Ms. Kelley Lewis at klh@klhadvisors.com*

By: 
Uriah J. Price

RECEIVED

MAR 23 2026

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

334-2026

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

In the Matter of the application of
CONTRA FED 18-19-30 1HF
by Phoenix Operating LLC
for a Permit to Drill an oil and gas well.

1. Name and address of Applicant:

Phoenix Operating LLC
4643 S Ulster, Ste 1510
Denver, CO 80237

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

**Surface Location at 1726' FNL and 736' FWL in SWNW,
Section 18, Township 26 North, Range 58 East, Richland
County, Montana.**

**Bottom Hole Location at 240' FSL and 660' FWL in SWSW,
Section 30, Township 26 North, Range 58 East, Richland
County, Montana.**

3. Total Depth Proposed to be Drilled:

25200' Measured Depth, 10200' Total Vertical Depth

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

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

Billings MT 59102
Office: (406) 656-0040
Fax: (406) 655-6015

March 19, 2026 COL-MT-202392 MMAXLP

RECEIVED

MAR 23 2026

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

334-2026

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

In the Matter of the application of
CONTRA FED 18-19-30 2HF
by **Phoenix Operating LLC**
for a Permit to Drill an oil and gas well.

1. Name and address of Applicant:

Phoenix Operating LLC
4643 S Ulster, Ste 1510
Denver, CO 80237

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

**Surface Location at 1744' FNL and 759' FWL in SWNW,
Section 18, Township 26 North, Range 58 East, Richland
County, Montana.**

**Bottom Hole Location at 240' FSL and 1945' FWL in SESW,
Section 30, Township 26 North, Range 58 East, Richland
County, Montana.**

3. Total Depth Proposed to be Drilled:

25200' Measured Depth, 10200' Total Vertical Depth

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

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

Billings MT 59102
Office: (406) 656-0040
Fax: (406) 655-6015

March 19, 2026 COL-MT-202391 MNAXLP

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MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

334-2026

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

In the Matter of the application of
CONTRA FED 18-19-30 3HF
by Phoenix Operating LLC
for a Permit to Drill an oil and gas well.

1. Name and address of Applicant:

**Phoenix Operating LLC
4643 S Ulster, Ste 1510
Denver, CO 80237**

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

**Surface Location at 1763' FNL and 783' FWL in SWNW,
Section 18, Township 26 North, Range 58 East, Richland
County, Montana.**

**Bottom Hole Location at 240' FSL and 1945' FEL in SWSE,
Section 30, Township 26 North, Range 58 East, Richland
County, Montana.**

3. Total Depth Proposed to be Drilled:

25200' Measured Depth, 10200' Total Vertical Depth

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

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

Billings MT 59102
Office: (406) 656-0040
Fax: (406) 655-6015

March 19, 2026 COL-MT-202394 MNAXLP

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MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

334-2026

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

In the Matter of the application of
CONTRA FED 18-19-30 4HF
by **Phoenix Operating LLC**
for a Permit to Drill an oil and gas well.

1. Name and address of Applicant:

Phoenix Operating LLC
4643 S Ulster, Ste 1510
Denver, CO 80237

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

**Surface Location at 1782' FNL and 807' FWL in SWNW,
Section 18, Township 26 North, Range 58 East, Richland
County, Montana.**

**Bottom Hole Location at 240' FSL and 660' FEL in SESE,
Section 30, Township 26 North, Range 58 East, Richland
County, Montana.**

3. Total Depth Proposed to be Drilled:

25200' Measured Depth, 10200' Total Vertical Depth

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

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

Billings MT 59102
Office: (406) 656-0040
Fax: (406) 655-6015

March 19, 2026 COL-MT-202393 MMAXLP

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MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

FAX COVER SHEET

TO	Ben Jones
COMPANY	Board of Oil & Gas Conservation - State of Montana
FAX NUMBER	14066525305
FROM	Anna Barbati
DATE	2026-03-24 22:33:37 GMT
RE	RE: Phoenix Operating LLC – Demands for Opportunity to be Heard concerning Continental Resources, Inc., one (1) Application for Permit to Drill.

COVER MESSAGE

Dear Mr. Jones:

Pursuant to A.R.M. § 36.22.601, enclosed please find one (1) Demand for Opportunity to be Heard, filed on behalf of Phoenix Operating LLC, concerning one (1) APD filed by Continental Resources, Inc., A Certificate of Service is attached to the Demand.

Please do not hesitate to call if you have questions.

Thanks,
Anna Barbati
Legal Assistant
KLH Advisors PLLC
anna@klhadvisors.com
406-577-2119

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

335-2026



*Legal clarity. Thoughtful strategy.
Every step of the way.*

March 24, 2026

E-MAIL AND FAX

Mr. Ben Jones
Administrator
Board of Oil & Gas Conservation
State of Montana
2535 St. John's Avenue
Billings, Montana 59102-4693
Fax No. (406)-652-5305

RE: Phoenix Operating LLC – Demands for Opportunity to be Heard concerning
Continental Resources, Inc., one (1) Application for Permit to Drill.

Dear Mr. Jones:

Pursuant to A.R.M. § 36.22.601, enclosed please find one (1) Demand for Opportunity to be Heard, filed on behalf of Phoenix Operating LLC, concerning one (1) APD filed by Continental Resources, Inc., A Certificate of Service is attached to the Demand.

Please do not hesitate to call if you have questions.

Sincerely,

Kelley Husmoeller Lewis

Kelley Lewis

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MAR 24 2026

MONTANA BOARD OF
GAS CONSERVATION • BILLINGS

1940 West Dickerson Street, Suite 206 | Bozeman, Montana 59718
(406) 577-2119 | www.klhadvisors.com



335-2026

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

<p>REGARDING CONTINENTAL RESOURCES, INC. APPLICATION FOR PERMIT TO DRILL OIL AND GAS WELL MAKO 1-14H, COMPRISED OF SECTIONS 14, 23, 26, AND 35, TOWNSHIP 27 NORTH, RANGE 55 EAST, RICHLAND COUNTY, MONTANA, AS PUBLISHED IN THE HELENA INDEPENDENT ON MARCH 12, 2026, AND THE SIDNEY HERALD ON MARCH 14, 2026.</p>	<p>DEMAND FOR OPPORTUNITY TO BE HEARD CONCERNING CONTINENTAL RESOURCES, INC. APPLICATION FOR PERMIT TO DRILL</p>
--	---

Pursuant to Montana Administrative Rule § 36.22.601, Phoenix Operating LLC, South Ulster Street, Suite 1510, Denver, Colorado, 80237, Phone No. (303) 749-0074 (“Phoenix”), demands an opportunity to be heard concerning an application for permit to drill shown in the Notices of Intention to Apply for Permit to Drill Oil and Gas Well, published by Continental Resources, Inc. (“Continental”) in the Helena Independent on March 12, 2026, and the Sidney Herald on March 14, 2026 (“Continental APD”). The Continental APD is for one (1) well to be drilled within a temporary spacing unit comprised of Sections 14, 23, 26, and 35, Township 27 North, Range 55 East, Richland County, Montana. This demand is timely per A.R.M. § 36.22.601(6)(d). *Enclosed are copies of Continental’s published notices with the applicable well name.*

1. The Montana Board of Oil and Gas Conservation (“MBOGC” and the “Board”) established a temporary spacing unit comprised of Sections 14, 23, 26, and 35, Township 27 North, Range 55 East, Richland County, Montana, under MBOGC Order No. 043-2026 (“TSU”).
2. Phoenix was the first operator to file a completed application for permit to drill within the TSU (“Phoenix APD”) pursuant to the Board’s regulations, and published notice of the Phoenix APD in the Helena Independent on February 21, 2026, and in the Sidney Herald on February 21, 2026.
3. To the extent that the MBOGC examines other factors in determining operatorship, Phoenix owns 28.0962383% of the working interest in Sections 14, 23, 26, and 35, Township 27 North, Range 55 East, Richland County. Phoenix plans to develop the underlying pool in an orderly manner alongside other development in the area. Continental’s APD fails to adequately provide for correlative rights or promote maximum efficient recovery of oil and gas in the State of Montana.

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MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

Page 1 of 3

335-2026

Accordingly, for the foregoing reasons, among others, denying the Continental APD is consistent with the Board's prior decisions and regulations and will ensure that the TSU is developed in a manner that promotes maximum efficient recovery, protects correlative rights, and prevents waste.

WHEREFORE, Phoenix respectfully requests the following relief:

1. That the Continental APD be referred to the MBOGC for notice and public hearing as required by A.R.M. § 36.22.601(4)(a);
2. That after hearing the MBOGC enter an Order denying Continental's APD,
3. The MBOGC enter an Order granting Phoenix's Application for Permit to Drill in the TSU; and
4. For such other relief as the MBOGC may deem appropriate.

DATED this 24th day of March 2026.

PHOENIX OPERATING LLC

By Kelley Huemoeller Lewis
Kelley Lewis, Attorney for Applicant
KLH Advisors PLLC
1940 West Dickerson Street, Suite 206
Bozeman, MT 59718
Telephone: (406) 577-2119
Email: klh@klhadvisors.com

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MAR 24 2026

Page 2 of 3

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

335 - 2026

CERTIFICATE OF SERVICE

I, Kelley Huemoeller Lewis, in accordance with A.R.M. § 36.22.601(6)(e), hereby certify that the foregoing demand for opportunity to be heard was served on this 24th day of March, 2026, addressed to the following:

Mr. Ben Jones
Administrator
Montana Board of Oil and Gas Conservation
2535 St. Johns Avenue
Billings, MT 59102
Fax No. (406) 652-5305

Via Fax, with a copy sent via electronic mail to bjones@mt.gov.

Continental Resources, Inc.
P.O. Box 268870
Oklahoma City, Oklahoma 73126
Fax No. (405) 234-9562

Via Fax, with a copy sent via certified mail.

By Kelley Huemoeller Lewis
Kelley Lewis, Attorney for Applicant
KLH Advisors PLLC
1940 West Dickerson Street, Suite 206
Bozeman, MT 59718
Telephone: (406) 577-2119
Email: klh@klhadvisors.com

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MAR 24 2026

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

Page 3 of 3

335-2026

Notice of Application

Published in Helena Independent Record on March 12, 2026

Location

Lewis and Clark County, Montana

Notice Text

Mako 1-14H

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

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

In the Matter of the Application of CONTINENTAL RESOURCES, INC. for a Permit to Drill a horizontal oil and gas well.

Name and Address of Applicant: Continental Resources, Inc.

P.O. Box 268870

Oklahoma City, Oklahoma 73126

(405) 234-9000 fax (405) 234-9562

Well Name and Legal Description: Mako 1-14H

Surface Hole Location: 501'FNL & 2201' FWL, NENW Sec 14-27N-55E

Horizontal Intercept: 615' FNL & 598' FWL, NWNW Sec 14-27N-55E

Horizontal Terminus: 200 FSL & 660 FWL, SWSW Sec 35-27N-55E

County: Richland

Proposed Total Depth: (1) 30624 MD; 9728 TVD

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

Montana Board of Oil and Gas Conservation

2535 St. John s Avenue

Billings, Montana 59102

FAX Number: (406) 655-6015

March 12, 2026 COL-MT-202356 MNAXLP

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MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

335-2026

Notice of Application

Published in Sidney Herald on March 14, 2026

Location

Richland County, Montana

Notice Text

Mako 1-14H

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

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

In the Matter of the Application of CONTINENTAL RESOURCES, INC. for a
Permit to Drill a horizontal oil and gas well.

Name and Address of Applicant: Continental Resources, Inc.

P.O. Box 268870

Oklahoma City, Oklahoma 73126

(405) 234-9000 fax (405) 234-9562

Well Name and Legal Description: Mako 1-14H

Surface Hole Location: 501' FNL & 2201' FWL, NENW Sec 14-27N-55E

Horizontal Intercept : 615' FNL & 598' FWL, NWNW Sec 14-27N-55E

Horizontal Terminus: 200 FSL & 660 FWL, SWSW Sec 35-27N-55E

County: Richland

Proposed Total Depth: (1) 30624 MD; 9728 TVD

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

Montana Board of Oil and Gas Conservation

2535 St. John s Avenue

Billings, Montana 59102

FAX Number: (406) 655-6015

Date: March 14, 2026

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MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

335-2026

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

REGARDING PHOENIX
OPERATING LLC'S
APPLICATIONS FOR PERMITS
TO DRILL THE BIRCH FED 34-27-
22 1HF, 2HF, 3HF, 4HF OIL AND
GAS WELLS IN A SPACING UNIT
COMPRISED OF ALL OF
SECTIONS 22, 27, 34 TOWNSHIP
25 NORTH, RANGE 56 EAST,
RICHLAND COUNTY,
MONTANA

MBOGC Docket No.

**DEMAND FOR OPPORTUNITY TO BE
HEARD CONCERNING PHOENIX
OPERATING LLC'S APPLICATIONS
FOR PERMITS TO DRILL**

Pursuant to Montana Administrative Rule § 36.22.601, CONTINENTAL RESOURCES, INC., 20 N. Broadway, Oklahoma City, OK 73102, phone number (405) 234-9327 ("Continental") demands an opportunity to be heard concerning applications for permits to drill shown in Notices of Intention to Apply for Permit to Drill Oil and Gas Well, published by Phoenix Operating LLC ("Phoenix") in the Helena Independent on March 21, 2026 ("Phoenix APDs"). This demand is timely per A.R.M. § 36.22.601(6)(d). Enclosed is a copy of Phoenix's published notice.

There is no spacing unit currently authorized for the requested wells. Continental has submitted an application to establish a spacing unit consisting of Sections 22, 23 and 24, T25N, R56E (Docket No. 275-2026) and an application to establish a spacing unit comprised of Sections 25, 26, 27, 28, T25N, R56E (Docket 277-2026). Continental's proposed spacing configuration better prevents waste, protects correlative rights and promotes orderly development.

Continental has significantly more experience drilling and operating wells than Phoenix. Continental has operated in the Williston Basin since 1989 and currently operates over 300 wells in Montana alone. In addition, it has drilled and completed thousands of wells in the Bakken/Three Forks Formation, demonstrating commercial success and repeatable results. Through methodical, pattern-based development, Continental has maximized recovery of its assets while improving capital efficiency and production delivery over time. Its development practices account for commodity price cyclicality, thereby maximizing recovery and long-term value for all stakeholders.

By contrast, Phoenix has drilled and completed 9 total wells in Montana. Phoenix's development approach emphasizes near term production rather than a coordinated development strategy structured to maximize ultimate recovery. Phoenix realizes the short-term benefits of batch drilling while mineral owners bear the corresponding disadvantage of reduced ultimate recovery and royalty income tied to suboptimal timing.

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Continental plans to develop the spacing unit in conjunction with other development in the area through an orderly, pattern-based approach that prevents waste and maximizes ultimate recovery, consistent with its proven development practices in the Williston Basin over the past 35 years. Approval of the Phoenix APDs would materially disrupt that orderly development by forcing premature, uncoordinated drilling, increasing development costs, and constraining Continental's ability to implement a comprehensive development plan. The record will show that approval of the Phoenix APDs would disrupt orderly development, promote waste and impair correlative rights contrary to Title 82, MCA.

Because the proposed Phoenix APDs cannot be approved concurrently with Continental's pending permits without impairing correlative rights and promoting waste, only one development plan may lawfully proceed. Under these circumstances, Montana law requires issuance of the permit that best promotes orderly development, protects correlative rights and prevents waste. The record will show that Continental's development plan satisfies those standards, while the Phoenix APDs do not.

Continental respectfully requests the following relief:

1. That the Phoenix APDs be referred to the Board for notice and public hearing as required by A.R.M. § 36.22.601(4)(a).
2. After hearing the matter, the Board enter its order denying the Phoenix permits.
3. For such other relief as the Board may deem appropriate.

Dated March 26th, 2026.

CONTINENTAL RESOURCES
INC.

By Scotti Gray
Scotti Gray
(406) 248-4141
Attorney for Applicant

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MAR 26 2026

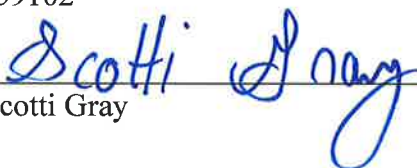
MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

CERTIFICATE OF SERVICE

I hereby certify that that on the 26th day of March 2026, I served a true and correct copy of the foregoing document to the following:

<input checked="" type="checkbox"/> U.S. Mail	Phoenix Operating LLC
<input type="checkbox"/> Facsimile	4643 S Ulster, Ste 1510
<input type="checkbox"/> FedEx	Denver, CO 80237
<input type="checkbox"/> E-mail	
<input type="checkbox"/> Hand delivery	With a copy sent via email to Phoenix's legal counsel Kelly Lewis at: klh@klhadvisors.com

<input type="checkbox"/> U.S. Mail	Ben Jones
<input type="checkbox"/> Facsimile	Administrator
<input type="checkbox"/> FedEx	MBOGC
<input type="checkbox"/> E-mail	2535 St. Johns Ave.
<input checked="" type="checkbox"/> Hand delivery	Billings, MT 59102



Scotti Gray

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MAR 26 2026

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

Notice of Application

Published in Helena Independent Record on March 21, 2026

Location

Lewis and Clark County, Montana.

Notice Text

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

In the Matter of the application of

BIRCH FED 34-27-22 1HF

by Phoenix Operating LLC

for a Permit to Drill an oil and gas well.

1. Name and address of Applicant:

Phoenix Operating LLC

4643 S Ulster, Ste 1510

Denver, CO 80237

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

Surface Location at 435' FNL and 2539' FEL in Lot 2,

Section 1, Township 24 North, Range 56 East, Richland County, Montana.

Bottom Hole Location at 240' FNL and 550' FWL in NWNW,

Section 22, Township 25 North, Range 56 East, Richland County, Montana.

3. Total Depth Proposed to be Drilled:

25500' Measured Depth, 10250' Total Vertical Depth

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

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

Billings MT 59102

Office: (406) 656-0040

Fax: (406) 655-6015

Notice of Application

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MONTANA BOARD OF OIL &
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336-2026

Notice of Application

Published in Helena Independent Record on March 21, 2026

Location

Lewis and Clark County, Montana

Notice Text

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

In the Matter of the application of

BIRCH FED 34-27-22 2HF

by Phoenix Operating LLC

for a Permit to Drill an oil and gas well.

1. Name and address of Applicant:

Phoenix Operating LLC

4643 S Ulster, Ste 1510

Denver, CO 80237

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

Surface Location at 435' FNL and 2509' FEL in Lot 2,

Section 1, Township 24 North, Range 56 East, Richland County, Montana.

Bottom Hole Location at 240' FNL and 1945' FWL in NENW,

Section 22, Township 25 North, Range 56 East, Richland County, Montana.

3. Total Depth Proposed to be Drilled:

25500' Measured Depth, 10250' Total Vertical Depth

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

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

Billings MT 59102

Office: (406) 656-0040

Fax: (406) 655-6015

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336-2026

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

Notice of Application

Published in Helena Independent Record on March 21, 2026

Location

Lewis and Clark County, Montana

Notice Text

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

In the Matter of the application of

BIRCH FED 34-27-22 3HF

by Phoenix Operating LLC

for a Permit to Drill an oil and gas well.

1. Name and address of Applicant:

Phoenix Operating LLC

4643 S Ulster, Ste 1510

Denver, CO 80237

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

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Section 1, Township 24 North, Range 56 East, Richland County, Montana.

Bottom Hole Location at 240' FNL and 1945' FEL in NWNE,

Section 22, Township 25 North, Range 56 East, Richland County, Montana.

3. Total Depth Proposed to be Drilled:

25500' Measured Depth, 10250' Total Vertical Depth

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

Billings MT 59102

Office: (406) 656-0040

Fax: (406) 655-6015

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MAR 26 2026

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

336 - 2026

Published in Helena Independent Record on March 21, 2026

Location

Lewis and Clark County, Montana

Notice Text

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

In the Matter of the application of

BIRCH 34-27-22 4HF

by Phoenix Operating LLC

for a Permit to Drill an oil and gas well.

1. Name and address of Applicant:

Phoenix Operating LLC

4643 S Ulster, Ste 1510

Denver, CO 80237

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

Surface Location at 435' FNL and 2449' FEL in Lot 2,

Section 1, Township 24 North, Range 56 East, Richland County, Montana.

Bottom Hole Location at 240' FNL and 550' FEL in NENE,

Section 22, Township 25 North, Range 56 East, Richland County, Montana.

3. Total Depth Proposed to be Drilled:

25500' Measured Depth, 10250' Total Vertical Depth

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

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

Billings MT 59102

Office: (406) 656-0040

Fax: (406) 655-6015

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MAR 26 2026

336-2026

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

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

REGARDING PHOENIX
OPERATING LLC'S
APPLICATIONS FOR PERMITS
TO DRILL THE CONTRA 18-19-30
1HF, 2HF, 3HF, 4HF OIL AND GAS
WELLS IN A SPACING UNIT
COMPRISED OF ALL OF
SECTIONS 18, 19, 30 TOWNSHIP
26 NORTH, RANGE 58 EAST,
RICHLAND COUNTY,
MONTANA

MBOGC Docket No.

**DEMAND FOR OPPORTUNITY TO BE
HEARD CONCERNING PHOENIX
OPERATING LLC'S APPLICATIONS
FOR PERMITS TO DRILL**

Pursuant to Montana Administrative Rule § 36.22.601, CONTINENTAL RESOURCES, INC., 20 N. Broadway, Oklahoma City, OK 73102, phone number (405) 234-9327 ("Continental") demands an opportunity to be heard concerning applications for permits to drill shown in Notices of Intention to Apply for Permit to Drill Oil and Gas Well, published by Phoenix Operating LLC ("Phoenix") in the Helena Independent on March 19 and March 21, 2026 ("Phoenix APDs"). This demand is timely per A.R.M. § 36.22.601(6)(d). Enclosed is a copy of Phoenix's published notice.

Continental owns a 22% working interest in the spacing unit comprised of Sections 18, 19, 30, T26N, R58E and objects to Phoenix's APD on the grounds that it will not prevent waste, protect correlative rights or promote orderly development. Continental has significantly more experience drilling and operating wells than Phoenix. Continental has operated in the Williston Basin since 1989 and currently operates over 300 wells in Montana alone. In addition, it has drilled and completed thousands of wells in the Bakken/Three Forks Formation, demonstrating commercial success and repeatable results. Through methodical, pattern-based development, Continental has maximized recovery of its assets while improving capital efficiency and production delivery over time. Its development practices account for commodity price cyclicality, thereby maximizing recovery and long-term value for all stakeholders.

By contrast, Phoenix has drilled and completed 9 total wells in Montana. Phoenix's development approach emphasizes near term production rather than a coordinated development strategy structured to maximize ultimate recovery. Phoenix realizes the short-term benefits of batch drilling while mineral owners bear the corresponding disadvantage of reduced ultimate recovery and royalty income tied to suboptimal timing.

Continental respectfully requests the following relief:

1. That the Phoenix APDs be referred to the Board for notice and public hearing as required by A.R.M. § 36.22.601(4)(a).

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GAS CONSERVATION • BILLINGS**

2. After hearing the matter, the Board enter its order denying the Phoenix permits.
3. For such other relief as the Board may deem appropriate.

Dated March 26th, 2026.

CONTINENTAL RESOURCES
INC.

By 
Scotti Gray
(406) 248-4141
Attorney for Applicant

CERTIFICATE OF SERVICE

I hereby certify that that on the 26th day of March 2026, I served a true and correct copy of the foregoing document to the following:


- U.S. Mail
- Facsimile
- FedEx
- E-mail
- Hand delivery

Phoenix Operating LLC
4643 S Ulster, Ste 1510
Denver, CO 80237

With a copy sent via email to Phoenix's legal counsel Kelly Lewis at: klh@klhadvisors.com

- U.S. Mail
- Facsimile
- FedEx
- E-mail
- Hand delivery

Ben Jones
Administrator
MBOGC
2535 St. Johns Ave.
Billings, MT 59102


Scotti Gray

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MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

Notice of Application

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Location

Lewis and Clark County, Montana

Notice Text

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

In the Matter of the application of

CONTRA 18-19-30 1HF

by Phoenix Operating LLC

for a Permit to Drill an oil and gas well.

1. Name and address of Applicant:

Phoenix Operating LLC

4643 S Ulster, Ste 1510

Denver, CO 80237

2. Legal Description including County and Approximate Footages of Surface Location of Proposed Oil and Gas Well:

(and projected bottom-hole location, if a directional or horizontal well)

Surface Location at 1782' FNL and 736' FWL in SWNW,

Section 18, Township 26 North, Range 58 East, Richland County, Montana.

Bottom Hole Location at 240' FSL and 660' FWL in SWSW,

Section 30, Township 26 North, Range 58 East, Richland County, Montana.

3. Total Depth Proposed to be Drilled:

25200' Measured Depth, 10200' Total Vertical Depth

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

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

Billings MT 59102

Office: (406) 656-0040

Fax: (406) 655-6015

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Notice of Application

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Lewis and Clark County, Montana

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

In the Matter of the application of

CONTRA FED 18-19-30 2HF

by Phoenix Operating LLC

for a Permit to Drill an oil and gas well.

1. Name and address of Applicant:

Phoenix Operating LLC

4643 S Ulster, Ste 1510

Denver, CO 80237

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

Surface Location at 1744' FNL and 759' FWL in SWNW,

Section 18, Township 26 North, Range 58 East, Richland County, Montana.

Bottom Hole Location at 240' FSL and 1945' FWL in SESW,

Section 30, Township 26 North, Range 58 East, Richland County, Montana.

3. Total Depth Proposed to be Drilled:

25200' Measured Depth, 10200' Total Vertical Depth

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

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Lewis and Clark County, Montana

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NOTICE OF INTENTION TO APPLY FOR PERMIT TO DRILL OIL AND GAS WELL
BEFORE THE BOARD OF OIL AND GAS CONSERVATION OF THE STATE OF MONTANA
In the Matter of the application of
CONTRA FED 18-19-30 3HF
by Phoenix Operating LLC
for a Permit to Drill an oil and gas well.

1. Name and address of Applicant:

Phoenix Operating LLC
4643 S Ulster, Ste 1510
Denver, CO 80237

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

**Surface Location at 1763' FNL and 783' FWL in SWNW,
Section 18, Township 26 North, Range 58 East, Richland County, Montana.**
**Bottom Hole Location at 240' FSL and 1945' FEL in SWSE,
Section 30, Township 26 North, Range 58 East, Richland County, Montana.**

3. Total Depth Proposed to be Drilled:

25200' Measured Depth, 10200' Total Vertical Depth

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

Montana Board of Oil and Gas Conservation 2535 St. Johns Avenue
Billings MT 59102
Office: (406) 656-0040
Fax: (406) 655-6015

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

In the Matter of the application of

CONTRA FED 18-19-30 4HF

by Phoenix Operating LLC

for a Permit to Drill an oil and gas well.

1. Name and address of Applicant:

Phoenix Operating LLC

4643 S Ulster, Ste 1510

Denver, CO 80237

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

Surface Location at 1782' FNL and 807' FWL in SWNW,

Section 18, Township 26 North, Range 58 East, Richland County, Montana.

Bottom Hole Location at 240' FSL and 660' FEL in SESE,

Section 30, Township 26 North, Range 58 East, Richland County, Montana.

3. Total Depth Proposed to be Drilled:

25200' Measured Depth, 10200' Total Vertical Depth

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

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Billings MT 59102

Office: (406) 656-0040

Fax: (406) 655-6015

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

REGARDING PHOENIX
OPERATING LLC'S
APPLICATIONS FOR PERMITS
TO DRILL THE OAK 26-23 1H, 2H,
3H, 4H OIL AND GAS WELLS IN
A SPACING UNIT COMPRISED
OF ALL OF SECTIONS 23 AND 26
TOWNSHIP 25 NORTH, RANGE
56 EAST, RICHLAND COUNTY,
MONTANA

MBOGC Docket No.

**DEMAND FOR OPPORTUNITY TO BE
HEARD CONCERNING PHOENIX
OPERATING LLC'S APPLICATIONS
FOR PERMITS TO DRILL**

Pursuant to Montana Administrative Rule § 36.22.601, CONTINENTAL RESOURCES, INC., 20 N. Broadway, Oklahoma City, OK 73102, phone number (405) 234-9327 ("Continental") demands an opportunity to be heard concerning applications for permits to drill shown in Notices of Intention to Apply for Permit to Drill Oil and Gas Well, published by Phoenix Operating LLC ("Phoenix") in the Helena Independent on March 19, 2026 ("Phoenix APDs"). This demand is timely per A.R.M. § 36.22.601(6)(d). Enclosed is a copy of Phoenix's published notice.

There is no spacing unit currently authorized for the requested wells. Continental has submitted an application to establish a spacing unit consisting of Sections 22, 23 and 24, T25N, R56E (Docket No. 275-2026) and an application to establish a spacing unit comprised of Sections 25, 26, 27, 28, T25N, R56E (Docket 277-2026). Continental's proposed spacing configuration better prevents waste, protects correlative rights and promotes orderly development.

Continental has significantly more experience drilling and operating wells than Phoenix. Continental has operated in the Williston Basin since 1989 and currently operates over 300 wells in Montana alone. In addition, it has drilled and completed thousands of wells in the Bakken/Three Forks Formation, demonstrating commercial success and repeatable results. Through methodical, pattern-based development, Continental has maximized recovery of its assets while improving capital efficiency and production delivery over time. Its development practices account for commodity price cyclicality, thereby maximizing recovery and long-term value for all stakeholders.

By contrast, Phoenix has drilled and completed 9 total wells in Montana. Phoenix's development approach emphasizes near term production rather than a coordinated development strategy structured to maximize ultimate recovery. Phoenix realizes the short-term benefits of batch drilling while mineral owners bear the corresponding disadvantage of reduced ultimate recovery and royalty income tied to suboptimal timing. In addition, Phoenix is proposed 2 mile laterals, which have historically been shown to be less economic than 3 and 4 mile laterals.

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Continental plans to develop the spacing unit in conjunction with other development in the area through an orderly, pattern-based approach that prevents waste and maximizes ultimate recovery, consistent with its proven development practices in the Williston Basin over the past 35 years. Approval of the Phoenix APDs would materially disrupt that orderly development by forcing premature, uncoordinated drilling, increasing development costs, and constraining Continental's ability to implement a comprehensive development plan. The record will show that approval of the Phoenix APDs would disrupt orderly development, promote waste and impair correlative rights contrary to Title 82, MCA.

Because the proposed Phoenix APDs cannot be approved concurrently with Continental's pending permits without impairing correlative rights and promoting waste, only one development plan may lawfully proceed. Under these circumstances, Montana law requires issuance of the permit that best promotes orderly development, protects correlative rights and prevents waste. The record will show that Continental's development plan satisfies those standards, while the Phoenix APDs do not.

Continental respectfully requests the following relief:

1. That the Phoenix APDs be referred to the Board for notice and public hearing as required by A.R.M. § 36.22.601(4)(a).
2. After hearing the matter, the Board enter its order denying the Phoenix permits.
3. For such other relief as the Board may deem appropriate.

Dated March 26th, 2026.

CONTINENTAL RESOURCES
INC.

By 
Scotti Gray
(406) 248-4141
Attorney for Applicant

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CERTIFICATE OF SERVICE

I hereby certify that that on the 26th day of March 2026, I served a true and correct copy of the foregoing document to the following:

- U.S. Mail
- Facsimile
- FedEx
- E-mail
- Hand delivery

Phoenix Operating LLC
4643 S Ulster, Ste 1510
Denver, CO 80237

With a copy sent via email to Phoenix's legal counsel Kelly Lewis at: klh@klhadvisors.com

- U.S. Mail
- Facsimile
- FedEx
- E-mail
- Hand delivery

Ben Jones
Administrator
MBOGC
2535 St. Johns Ave.
Billings, MT 59102



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

In the Matter of the application of

OAK 26-23 1H

by Phoenix Operating LLC

for a Permit to Drill an oil and gas well.

1. Name and address of Applicant:

Phoenix Operating LLC

4643 S Ulster, Ste 1510

Denver, CO 80237

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

Surface Location at 2221' FNL and 441' FEL in SENE,

Section 35, Township 25 North, Range 56 East, Richland County, Montana.

Bottom Hole Location at 240' FNL and 550' FWL in NWNW,

Section 23, Township 25 North, Range 56 East, Richland County, Montana.

3. Total Depth Proposed to be Drilled:

20300' Measured Depth, 10300' Total Vertical Depth

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

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

Billings MT 59102

Office: (406) 656-0040

Fax: (406) 655-6015

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In the Matter of the application of

OAK 26-23 2H

by Phoenix Operating LLC

for a Permit to Drill an oil and gas well.

1. Name and address of Applicant:

Phoenix Operating LLC

4643 S Ulster, Ste 1510

Denver, CO 80237

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

Surface Location at 2221' FNL and 411' FEL in SENE,

Section 35, Township 25 North, Range 56 East, Richland County, Montana.

Bottom Hole Location at 240' FNL and 1945' FWL in NENW,

Section 23, Township 25 North, Range 56 East, Richland County, Montana.

3. Total Depth Proposed to be Drilled:

20300' Measured Depth, 10300' Total Vertical Depth

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1. Name and address of Applicant:

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4643 S Ulster, Ste 1510

Denver, CO 80237

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

Surface Location at 2221' FNL and 351' FEL in SENE,

Section 35, Township 25 North, Range 56 East, Richland County, Montana.

Bottom Hole Location at 240' FNL and 550' FEL in NENE,

Section 23, Township 25 North, Range 56 East, Richland County, Montana.

3. Total Depth Proposed to be Drilled:

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

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Surface Location at 2221' FNL and 351' FEL in SENE,

Section 35, Township 25 North, Range 56 East, Richland County, Montana.

Bottom Hole Location at 240' FNL and 550' FEL in NENE,

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3. Total Depth Proposed to be Drilled:

20300' Measured Depth, 10300' Total Vertical Depth

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

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

Billings MT 59102

Office: (406) 656-0040

Fax: (406) 655-6015

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MAR 26 2026

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

338-2026

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

REGARDING PHOENIX
OPERATING LLC'S
APPLICATIONS FOR PERMITS
TO DRILL THE SHANE FED 27-
22-15-10-3 1HF, 2HF, 3HF, 4HF OIL
AND GAS WELLS IN A
PROPOSED SPACING UNIT
COMPRISED OF ALL OF
SECTIONS 3, 10, 15, 22, 27
TOWNSHIP 26 NORTH, RANGE
55 EAST, RICHLAND COUNTY,
MONTANA

MBOGC Docket No.

**DEMAND FOR OPPORTUNITY TO BE
HEARD CONCERNING PHOENIX
OPERATING LLC'S APPLICATIONS
FOR PERMITS TO DRILL**

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MAR 26 2026

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

Pursuant to Montana Administrative Rule § 36.22.601, CONTINENTAL RESOURCES, INC., 20 N. Broadway, Oklahoma City, OK 73102, phone number (405) 234-9327 ("Continental") demands an opportunity to be heard concerning applications for permits to drill shown in Notices of Intention to Apply for Permit to Drill Oil and Gas Well, published by Phoenix Operating LLC ("Phoenix") in the Helena Independent on March 19, 2026 ("Phoenix APDs"). This demand is timely per A.R.M. § 36.22.601(6)(d). Enclosed is a copy of Phoenix's published notice.

There is no spacing unit currently authorized for the requested wells. Continental has submitted an application to establish a spacing unit consisting of Sections 27 and 34, T26N, R55E and Sections 3 and 10, T25N, R55E (Docket No. 273-2026). Continental's proposed spacing configuration better prevents waste, protects correlative rights and promotes orderly development.

Continental has significantly more experience drilling and operating wells than Phoenix. Continental has operated in the Williston Basin since 1989 and currently operates over 300 wells in Montana alone. In addition, it has drilled and completed thousands of wells in the Bakken/Three Forks Formation, demonstrating commercial success and repeatable results. Through methodical, pattern-based development, Continental has maximized recovery of its assets while improving capital efficiency and production delivery over time. Its development practices account for commodity price cyclicality, thereby maximizing recovery and long-term value for all stakeholders.

By contrast, Phoenix has drilled and completed 9 total wells in Montana. Phoenix's development approach emphasizes near term production rather than a coordinated development strategy structured to maximize ultimate recovery. Phoenix realizes the short-term benefits of batch drilling while mineral owners bear the corresponding disadvantage of reduced ultimate recovery and royalty income tied to suboptimal timing. Approval of a 5 mile APD requires evidence that the applicant can efficiently design drill and complete at that scale. Phoenix's performance at shorter lateral lengths raises questions about efficiency and larger scales. A five-mile configuration introduces materially greater

technical and operational complexity. The record will demonstrate that Phoenix cannot efficiently develop a five-mile unit.

Continental plans to develop the spacing unit in conjunction with other development in the area through an orderly, pattern-based approach that prevents waste and maximizes ultimate recovery, consistent with its proven development practices in the Williston Basin over the past 35 years. Approval of the Phoenix APDs would materially disrupt that orderly development by forcing premature, uncoordinated drilling, increasing development costs, and constraining Continental's ability to implement a comprehensive development plan. The record will show that approval of the Phoenix APDs would disrupt orderly development, promote waste and impair correlative rights contrary to Title 82, MCA.

Because the proposed Phoenix APDs cannot be approved concurrently with Continental's pending permits without impairing correlative rights and promoting waste, only one development plan may lawfully proceed. Under these circumstances, Montana law requires issuance of the permit that best promotes orderly development, protects correlative rights and prevents waste. The record will show that Continental's development plan satisfies those standards, while the Phoenix APDs do not.

Continental respectfully requests the following relief:

1. That the Phoenix APDs be referred to the Board for notice and public hearing as required by A.R.M. § 36.22.601(4)(a).
2. After hearing the matter, the Board enter its order denying the Phoenix permits.
3. For such other relief as the Board may deem appropriate.

Dated March 26th, 2026.

CONTINENTAL RESOURCES
INC.

By 
Scotti Gray
(406) 248-4141
Attorney for Applicant

RECEIVED

MAR 26 2026

Notice of Application

Published in Helena Independent Record on March 19, 2026

Location

Lewis and Clark County, Montana

Notice Text

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

In the Matter of the application of

SHANE FED 27-22-15-10-3 1HF
by Phoenix Operating LLC

for a Permit to Drill an oil and gas well.

1. Name and address of Applicant:

Phoenix Operating LLC
4643 S Ulster, Ste 1510
Denver, CO 80237

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

Surface Location at 313' FNL and 2091' FEL in NWNE,
Section 34, Township 26 North, Range 55 East, Richland County, Montana.
Bottom Hole Location at 240' FNL and 550' FWL in Lot 4,
Section 3, Township 26 North, Range 55 East, Richland County, Montana.

3. Total Depth Proposed to be Drilled:

36802' Measured Depth, 9987' Total Vertical Depth

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

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

Billings MT 59102

Office: (406) 656-0040

Fax: (406) 655-6015

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MAR 26 2026

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

339-2026

Notice of Application

Published in Helena Independent Record on March 19, 2026

Location

Lewis and Clark County, Montana

Notice Text

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

In the Matter of the application of

SHANE FED 27-22-15-10-3 2HF

by Phoenix Operating LLC

for a Permit to Drill an oil and gas well.

1. Name and address of Applicant:

Phoenix Operating LLC

4643 S Ulster, Ste 1510

Denver, CO 80237

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

Surface Location at 313' FNL and 2061' FEL in NWNE,

Section 34, Township 26 North, Range 55 East, Richland County, Montana.

Bottom Hole Location at 240' FNL and 1945' FWL in Lot 3,

Section 3, Township 26 North, Range 55 East, Richland County, Montana.

3. Total Depth Proposed to be Drilled:

36400' Measured Depth, 9987' Total Vertical Depth

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

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MONTANA BOARD OF OIL &
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339 - 2026

Notice of Application

Published in Helena Independent Record on March 19, 2026

Location

Lewis and Clark County, Montana

Notice Text

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

In the Matter of the application of

SHANE FED 27-22-15-10-3 3HF

by Phoenix Operating LLC

for a Permit to Drill an oil and gas well.

1. Name and address of Applicant:

Phoenix Operating LLC

4643 S Ulster, Ste 1510

Denver, CO 80237

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

Surface Location at 313' FNL and 2031' FEL in NWNE,

Section 34, Township 26 North, Range 55 East, Richland County, Montana.

Bottom Hole Location at 240' FNL and 1945' FEL in Lot 2,

Section 3, Township 26 North, Range 55 East, Richland County, Montana.

3. Total Depth Proposed to be Drilled:

36289' Measured Depth, 9987' Total Vertical Depth

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

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

Billings MT 59102

Office: (406) 656-0040

Fax: (406) 655-6015

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MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

339 - 2026

Notice of Application

Published in Helena Independent Record on March 19, 2026

Location

Lewis and Clark County, Montana

Notice Text

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

In the Matter of the application of

SHANE FED 27-22-15-10-3 4HF

by Phoenix Operating LLC

for a Permit to Drill an oil and gas well.

1. Name and address of Applicant:

Phoenix Operating LLC

4643 S Ulster, Ste 1510

Denver, CO 80237

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

Surface Location at 313' FNL and 2001' FEL in NWNE,

Section 34, Township 26 North, Range 55 East, Richland County, Montana.

Bottom Hole Location at 240' FNL and 550' FEL in Lot 1,

Section 3, Township 26 North, Range 55 East, Richland County, Montana.

3. Total Depth Proposed to be Drilled:

36441' Measured Depth, 9987' Total Vertical Depth

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

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

Billings MT 59102

Office: (406) 656-0040

Fax: (406) 655-6015

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MAR 26 2026

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

339 - 2026

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

REGARDING PHOENIX
OPERATING LLC'S
APPLICATIONS FOR PERMITS
TO DRILL THE SYCAMORE 33-28
1H, 2H, 3H, 4H OIL AND GAS
WELLS IN A SPACING UNIT
COMPRISED OF ALL OF
SECTIONS 33 AND 28 TOWNSHIP
25 NORTH, RANGE 56 EAST,
RICHLAND COUNTY,
MONTANA

MBOGC Docket No.

**DEMAND FOR OPPORTUNITY TO BE
HEARD CONCERNING PHOENIX
OPERATING LLC'S APPLICATIONS
FOR PERMITS TO DRILL**

Pursuant to Montana Administrative Rule § 36.22.601, CONTINENTAL RESOURCES, INC., 20 N. Broadway, Oklahoma City, OK 73102, phone number (405) 234-9327 ("Continental") demands an opportunity to be heard concerning applications for permits to drill shown in Notices of Intention to Apply for Permit to Drill Oil and Gas Well, published by Phoenix Operating LLC ("Phoenix") in the Helena Independent on March 19, 2026 ("Phoenix APDs"). This demand is timely per A.R.M. § 36.22.601(6)(d). Enclosed is a copy of Phoenix's published notice.

There is no spacing unit currently authorized for the requested wells. Continental has submitted an application to establish a spacing unit consisting of Sections 22, 23 and 24, T25N, R56E (Docket No. 275-2026) and an application to establish a spacing unit comprised of Sections 25, 26, 27, 28, T25N, R56E (Docket 277-2026). Continental's proposed spacing configuration better prevents waste, protects correlative rights and promotes orderly development.

Continental has significantly more experience drilling and operating wells than Phoenix. Continental has operated in the Williston Basin since 1989 and currently operates over 300 wells in Montana alone. In addition, it has drilled and completed thousands of wells in the Bakken/Three Forks Formation, demonstrating commercial success and repeatable results. Through methodical, pattern-based development, Continental has maximized recovery of its assets while improving capital efficiency and production delivery over time. Its development practices account for commodity price cyclicality, thereby maximizing recovery and long-term value for all stakeholders.

By contrast, Phoenix has drilled and completed 9 total wells in Montana. Phoenix's development approach emphasizes near term production rather than a coordinated development strategy structured to maximize ultimate recovery. Phoenix realizes the short-term benefits of batch drilling while mineral owners bear the corresponding disadvantage of reduced ultimate recovery and royalty income tied to suboptimal timing. In addition, Phoenix is proposed 2 mile laterals, which have historically been shown to be less economic than 3 and 4 mile laterals.

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MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

340-2026

Continental plans to develop the spacing unit in conjunction with other development in the area through an orderly, pattern-based approach that prevents waste and maximizes ultimate recovery, consistent with its proven development practices in the Williston Basin over the past 35 years. Approval of the Phoenix APDs would materially disrupt that orderly development by forcing premature, uncoordinated drilling, increasing development costs, and constraining Continental's ability to implement a comprehensive development plan. The record will show that approval of the Phoenix APDs would disrupt orderly development, promote waste and impair correlative rights contrary to Title 82, MCA.

Because the proposed Phoenix APDs cannot be approved concurrently with Continental's pending permits without impairing correlative rights and promoting waste, only one development plan may lawfully proceed. Under these circumstances, Montana law requires issuance of the permit that best promotes orderly development, protects correlative rights and prevents waste. The record will show that Continental's development plan satisfies those standards, while the Phoenix APDs do not.

Continental respectfully requests the following relief:

1. That the Phoenix APDs be referred to the Board for notice and public hearing as required by A.R.M. § 36.22.601(4)(a).
2. After hearing the matter, the Board enter its order denying the Phoenix permits.
3. For such other relief as the Board may deem appropriate.

Dated March 26th, 2026.

CONTINENTAL RESOURCES
INC.

By 
Scotti Gray
(406) 248-4141
Attorney for Applicant

RECEIVED

MAR 26 2026

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

340-2026

Notice of Application

Published in Helena Independent Record on March 19, 2026

Location

Lewis and Clark County, Montana

Notice Text

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

In the Matter of the application of

SYCAMORE 33-28 1H

by Phoenix Operating LLC

for a Permit to Drill an oil and gas well.

1. Name and address of Applicant:

Phoenix Operating LLC

4643 S Ulster, Ste 1510

Denver, CO 80237

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

Surface Location at 350' FSL and 405' FEL in SESE,

Section 33, Township 25 North, Range 56 East, Richland County, Montana.

Bottom Hole Location at 240' FNL and 550' FWL in NWNW,

Section 28, Township 25 North, Range 56 East, Richland County, Montana.

3. Total Depth Proposed to be Drilled:

22087' Measured Depth, 10399' Total Vertical Depth

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

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

Billings MT 59102

Office: (406) 656-0040

Fax: (406) 655-6015

RECEIVED

MAR 26 2026

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS
340-2026

Notice of Application

Published in Helena Independent Record on March 19, 2026

Location

Lewis and Clark County, Montana

Notice Text

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

In the Matter of the application of

SYCAMORE 33-28 2H

by Phoenix Operating LLC

for a Permit to Drill an oil and gas well.

1. Name and address of Applicant:

Phoenix Operating LLC

4643 S Ulster, Ste 1510

Denver, CO 80237

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

Surface Location at 350' FSL and 375' FEL in SESE,

Section 33, Township 25 North, Range 56 East, Richland County, Montana.

Bottom Hole Location at 240' FNL and 1945' FWL in NENW,

Section 28, Township 25 North, Range 56 East, Richland County, Montana.

3. Total Depth Proposed to be Drilled:

21421' Measured Depth, 10399' Total Vertical Depth

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

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

Billings MT 59102

Office: (406) 656-0040

Fax: (406) 655-6015

RECEIVED

MAR 26 2026

MONTANA BOARD OF OIL &
GAS CONSERVATION - BILLINGS
340-2026

Notice of Application

Published in Helena Independent Record on March 19, 2026

Location

Lewis and Clark County, Montana

Notice Text

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

In the Matter of the application of

SYCAMORE 33-28 3H

by Phoenix Operating LLC

for a Permit to Drill an oil and gas well.

1. Name and address of Applicant:

Phoenix Operating LLC

4643 S Ulster, Ste 1510

Denver, CO 80237

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

Surface Location at 350' FSL and 345' FEL in SESE,

Section 33, Township 25 North, Range 56 East, Richland County, Montana.

Bottom Hole Location at 240' FNL and 1945' FEL in NWNE,

Section 28, Township 25 North, Range 56 East, Richland County, Montana.

3. Total Depth Proposed to be Drilled:

20990' Measured Depth, 10399' Total Vertical Depth

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

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Notice of Application

Published in Helena Independent Record on March 19, 2026

Location

Lewis and Clark County, Montana

Notice Text

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

In the Matter of the application of

SYCAMORE 33-28 4H

by Phoenix Operating LLC

for a Permit to Drill an oil and gas well.

1. Name and address of Applicant:

Phoenix Operating LLC

4643 S Ulster, Ste 1510

Denver, CO 80237

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

Surface Location at 350' FSL and 315' FEL in SESE,

Section 33, Township 25 North, Range 56 East, Richland County, Montana.

Bottom Hole Location at 240' FNL and 550' FEL in NENE,

Section 28, Township 25 North, Range 56 East, Richland County, Montana.

3. Total Depth Proposed to be Drilled:

20804' Measured Depth, 10399' Total Vertical Depth

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

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

Billings MT 59102

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Fax: (406) 655-6015

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MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

340-2026

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

REGARDING PHOENIX
OPERATING LLC'S
APPLICATIONS FOR PERMITS
TO DRILL THE OUTLAW FED 23-
26-35 1HF, 2HF, 3HF, 4HF OIL
AND GAS WELLS IN A
PROPOSED SPACING UNIT
COMPRISED OF ALL OF
SECTIONS 23, 26, 35 TOWNSHIP
26 NORTH, RANGE 55 EAST,
RICHLAND COUNTY,
MONTANA

MBOGC Docket No.

**DEMAND FOR OPPORTUNITY TO BE
HEARD CONCERNING PHOENIX
OPERATING LLC'S APPLICATIONS
FOR PERMITS TO DRILL**

Pursuant to Montana Administrative Rule § 36.22.601, CONTINENTAL RESOURCES, INC., 20 N. Broadway, Oklahoma City, OK 73102, phone number (405) 234-9327 ("Continental") demands an opportunity to be heard concerning applications for permits to drill shown in Notices of Intention to Apply for Permit to Drill Oil and Gas Well, published by Phoenix Operating LLC ("Phoenix") in the Helena Independent on March 26, 2026 ("Phoenix APDs"). This demand is timely per A.R.M. § 36.22.601(6)(d). Enclosed is a copy of Phoenix's published notice.

There is no spacing unit currently authorized for the requested wells. Continental has submitted an application to establish a spacing unit consisting of Sections 26 and 35, T26N, R55E and Sections 2 and 11, T25N, R55E (Docket No. 271-2026). Continental's proposed spacing configuration better prevents waste, protects correlative rights and promotes orderly development.

Continental has significantly more experience drilling and operating wells than Phoenix. Continental has operated in the Williston Basin since 1989 and currently operates over 300 wells in Montana alone. In addition, it has drilled and completed thousands of wells in the Bakken/Three Forks Formation, demonstrating commercial success and repeatable results. Through methodical, pattern-based development, Continental has maximized recovery of its assets while improving capital efficiency and production delivery over time. Its development practices account for commodity price cyclicality, thereby maximizing recovery and long-term value for all stakeholders.

By contrast, Phoenix has drilled and completed 9 total wells in Montana. Phoenix's development approach emphasizes near term production rather than a coordinated development strategy structured to maximize ultimate recovery. Phoenix realizes the short-term benefits of batch drilling while mineral owners bear the corresponding disadvantage of reduced ultimate recovery and royalty income tied to suboptimal timing.

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Continental plans to develop the spacing unit in conjunction with other development in the area through an orderly, pattern-based approach that prevents waste and maximizes ultimate recovery, consistent with its proven development practices in the Williston Basin over the past 35 years. Approval of the Phoenix APDs would materially disrupt that orderly development by forcing premature, uncoordinated drilling, increasing development costs, and constraining Continental's ability to implement a comprehensive development plan. The record will show that approval of the Phoenix APDs would disrupt orderly development, promote waste and impair correlative rights contrary to Title 82, MCA.

Because the proposed Phoenix APDs cannot be approved concurrently with Continental's pending permits without impairing correlative rights and promoting waste, only one development plan may lawfully proceed. Under these circumstances, Montana law requires issuance of the permit that best promotes orderly development, protects correlative rights and prevents waste. The record will show that Continental's development plan satisfies those standards, while the Phoenix APDs do not.

Continental respectfully requests the following relief:

1. That the Phoenix APDs be referred to the Board for notice and public hearing as required by A.R.M. § 36.22.601(4)(a).
2. After hearing the matter, the Board enter its order denying the Phoenix permits.
3. For such other relief as the Board may deem appropriate.

Dated March 26th, 2026.

CONTINENTAL RESOURCES
INC.

By 
Scotti Gray
(406) 248-4141
Attorney for Applicant

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MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

CERTIFICATE OF SERVICE

I hereby certify that that on the 26th day of March 2026, I served a true and correct copy of the foregoing document to the following:


- U.S. Mail
- Facsimile
- FedEx
- E-mail
- Hand delivery

Phoenix Operating LLC
4643 S Ulster, Ste 1510
Denver, CO 80237

With a copy sent via email to Phoenix's legal counsel Kelly Lewis at: klh@klhadvisors.com

- U.S. Mail
- Facsimile
- FedEx
- E-mail
- Hand delivery

Ben Jones
Administrator
MBOGC
2535 St. Johns Ave.
Billings, MT 59102



Scotti Gray

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MAR 26 2026

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MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

Notice of Application

Published in Helena Independent Record on March 26, 2026

Location

Lewis and Clark County, Montana

Notice Text

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

In the Matter of the application of

OUTLAW 23-26-35 1HF

by Phoenix Operating LLC

for a Permit to Drill an oil and gas well.

1. Name and address of Applicant:

Phoenix Operating LLC

4643 S Ulster, Ste 1510

Denver, CO 80237

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

Surface Location at 846' FNL and 1918' FEL in NWNE,

Section 23, Township 26 North, Range 55 East, Richland County, Montana.

Bottom Hole Location at 240' FSL and 550' FWL in SWSW,

Section 35, Township 26 North, Range 55 East, Richland County, Montana.

3. Total Depth Proposed to be Drilled:

26303' Measured Depth, 9934' Total Vertical Depth

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

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

Billings MT 59102

Office: (406) 656-0040

Fax: (406) 655-6015

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MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

341-2026

Notice of Application

Published in Helena Independent Record on March 26, 2026

Location

Lewis and Clark County, Montana

Notice Text

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

In the Matter of the application of

OUTLAW 23-26-35 2HF

by Phoenix Operating LLC

for a Permit to Drill an oil and gas well.

1. Name and address of Applicant:

Phoenix Operating LLC

4643 S Ulster, Ste 1510

Denver, CO 80237

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

Surface Location at 846' FNL and 1888' FEL in NWNE,

Section 23, Township 26 North, Range 55 East, Richland County, Montana.

Bottom Hole Location at 240' FSL and 1945' FWL in SESW,

Section 35, Township 26 North, Range 55 East, Richland County, Montana.

3. Total Depth Proposed to be Drilled:

25874' Measured Depth, 9934' Total Vertical Depth

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

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

Billings MT 59102

Office: (406) 656-0040

Fax: (406) 655-6015

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MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

34 1 - 2026

Notice of Application

Published in Helena Independent Record on March 26, 2026

Location

Lewis and Clark County, Montana

Notice Text

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

In the Matter of the application of

OUTLAW FED 23-26-35 3HF

by Phoenix Operating LLC

for a Permit to Drill an oil and gas well.

1. Name and address of Applicant:

Phoenix Operating LLC

4643 S Ulster, Ste 1510

Denver, CO 80237

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

Surface Location at 846' FNL and 1858' FEL in NWNE,

Section 23, Township 26 North, Range 55 East, Richland County, Montana.

Bottom Hole Location at 240' FSL and 1945' FEL in SWSE,

Section 35, Township 26 North, Range 55 East, Richland County, Montana.

3. Total Depth Proposed to be Drilled:

25686' Measured Depth, 9934' Total Vertical Depth

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

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

Billings MT 59102

Office: (406) 656-0040

Fax: (406) 655-6015

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MAR 26 2026

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

34 1 - 2026

Notice of Application

Published in Helena Independent Record on March 26, 2026

Location

Lewis and Clark County, Montana

Notice Text

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

In the Matter of the application of

OUTLAW FED 23-26-35 4HF

by Phoenix Operating LLC

for a Permit to Drill an oil and gas well.

1. Name and address of Applicant:

Phoenix Operating LLC

4643 S Ulster, Ste 1510

Denver, CO 80237

2. Legal Description including County and Approximate Footages of Surface Location of Proposed Oil and Gas Well:

(and projected bottom-hole location, if a directional or horizontal well)

Surface Location at 846' FNL and 1828' FEL in NWNE,

Section 23, Township 26 North, Range 55 East, Richland County, Montana.

Bottom Hole Location at 240' FSL and 550' FEL in SESE,

Section 35, Township 26 North, Range 55 East, Richland County, Montana.

3. Total Depth Proposed to be Drilled:

25811' Measured Depth, 9934' Total Vertical Depth

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

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

Billings MT 59102

Office: (406) 656-0040

Fax: (406) 655-6015

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MAR 26 2026

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

FAX COVER SHEET

TO	Ben Jones
COMPANY	Board of Oil & Gas Conservation State of Montana
FAX NUMBER	14066525305
FROM	Anna Barbati
DATE	2026-03-31 17:34:46 GMT
RE	Phoenix Operating LLC - Demands for Opportunity to be Heard concerning Continental Resources, Inc., two (2) Applications for Permit to Drill.

COVER MESSAGE

Dear Mr. Jones:

Pursuant to A.R.M. § 36.22.601, enclosed please find two (2) Demands for Opportunity to be Heard, filed on behalf of Phoenix Operating LLC, concerning two (2) APDs filed by Continental Resources, Inc. A Certificate of Service is attached to the Demand.

Please do not hesitate to call if you have questions.

Sincerely,
Anna Barbati
Legal Assistant
KLH Advisors PLLC
anna@klhadvisors.com
Phone: 406-577-2119

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

342 - 2026



*Legal clarity. Thoughtful strategy.
Every step of the way.*

March 31, 2026

E-MAIL AND FAX

Mr. Ben Jones
Administrator
Board of Oil & Gas Conservation
State of Montana
2535 St. John's Avenue
Billings, Montana 59102-4693
Fax No. (406)-652-5305

RE: Phoenix Operating LLC – Demands for Opportunity to be Heard concerning Continental Resources, Inc., two (2) Applications for Permit to Drill.

Dear Mr. Jones:

Pursuant to A.R.M. § 36.22.601, enclosed please find two (2) Demands for Opportunity to be Heard, filed on behalf of Phoenix Operating LLC, concerning two (2) APDs filed by Continental Resources, Inc. A Certificate of Service is attached to the Demand.

Please do not hesitate to call if you have questions.

Sincerely,

A handwritten signature in cursive script that reads 'Kelley Husmoeller Lewis'.

Kelley Lewis

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MAR 31 2026

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

1940 West Dickerson Street, Suite 206 | Bozeman, Montana 59718
(406) 577-2119 | www.klhadvisors.com



342-2026

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

<p>REGARDING CONTINENTAL RESOURCES, INC. APPLICATION FOR PERMIT TO DRILL OIL AND GAS WELL TOPIC 1-24H COMPRISED OF SECTIONS 22, 23, AND 24, TOWNSHIP 25 NORTH, RANGE 56 EAST, RICHLAND COUNTY, MONTANA, AS PUBLISHED IN THE HELENA INDEPENDENT ON MARCH 17, 2026 AND THE SIDNEY HERALD ON MARCH 21, 2026.</p>	<p>DEMAND FOR OPPORTUNITY TO BE HEARD CONCERNING CONTINENTAL RESOURCES, INC.'S APPLICATION FOR PERMIT TO DRILL</p>
---	---

Pursuant to Montana Administrative Rule § 36.22.601, Phoenix Operating LLC, 4643 South Ulster Street, Suite 1510, Denver, Colorado, 80237, Phone No. (303) 749-0074 (“Phoenix”), demands an opportunity to be heard concerning an application for permit to drill shown in the Notice of Intention to Apply for Permit to Drill Oil and Gas Well, published by Continental Resources, Inc. (“Continental”) in the Helena Independent on March 17, 2026, and the Sidney Herald on March 21, 2026 (“Continental APD”). The Continental APD is for one (1) well to be drilled within a non-existing temporary spacing unit (“TSU”) comprised of Sections 22, 23, and 24, Township 25 North, Range 56 East, Richland County, Montana. This demand is timely per A.R.M. § 36.22.601(6)(d). *Enclosed are copies of Continental’s published notices with the applicable well name.*

1. The Montana Board of Oil and Gas Conservation (“MBOGC” and the “Board”) has not previously established a TSU or approved the proposed TSU comprised of Sections 22, 23, and 24, Township 25 North, Range 56 East, Richland County, Montana, scheduled for the April Docket at Docket No. 275-2026.
2. Phoenix has proposed an alternative plan of development that includes portions of Sections 22, 23, and 24, Township 25 North, Range 56 East, Richland County, Montana, which is also scheduled for the April 2026 Docket at Docket Nos. 279-2026, 283-2026, and 285-2026.
3. To the extent that the MBOGC examines other factors in approving an APD, Phoenix owns 39.798% of the working interest in Sections 22, 23, and 24, Township 25 North, Range 56 East, Richland County, Montana. Furthermore, Phoenix plans to develop the underlying pool in an orderly manner alongside other development in the area. Continental’s APD fails to adequately protect correlative rights or promote maximum efficient recovery of oil and gas in the State of Montana, and the APD is not tied to an existing TSU.

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Accordingly, for the foregoing reasons, among others, denying the Continental APD is consistent with the Board's prior decisions and regulations and will ensure that Sections 22, 23, and 24, Township 25 North, Range 56 East, Richland County, Montana, are developed in a manner that promotes maximum efficient recovery, protects correlative rights, and prevents waste.

WHEREFORE, Phoenix respectfully requests the following relief:

1. That the Continental APD be referred to the MBOGC for notice and public hearing as required by A.R.M. § 36.22.601(4)(a);
2. That after hearing the MBOGC enter an Order denying Continental's APD;
3. The MBOGC enter an Order granting Phoenix's plan of development, which includes Docket Nos. 279-2026, 283-2026, and 285-2026; and
4. For such other relief as the MBOGC may deem appropriate.

DATED this ___th day of March 2026.

PHOENIX OPERATING LLC

By Kelley Huemoeller Lewis
 Kelley Lewis, Attorney for Applicant
 KLH Advisors PLLC
 1940 West Dickerson Street, Suite 206
 Bozeman, MT 59718
 Telephone: (406) 577-2119
 Email: klh@klhadvisors.com

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MAR 31 2026

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

CERTIFICATE OF SERVICE

I, Kelley Huemoeller Lewis, in accordance with A.R.M. § 36.22.601(6)(e), hereby certify that the foregoing demand for opportunity to be heard was served on this 27th day of March, 2026, addressed to the following:

Mr. Ben Jones
Administrator
Montana Board of Oil and Gas Conservation
2535 St. Johns Avenue
Billings, MT 59102
Fax No. (406) 652-5305
Via Fax, with a copy sent via electronic mail to bjones@mt.gov

Continental Resources, Inc.
Attn: Scotti Gray
P.O. Box 268870
Oklahoma City, Oklahoma 73126
Fax No. (405) 234-9562
Via Fax, with a copy sent via certified mail and electronic mail to scotti@graylawmt.com

By *Kelley Huemoeller Lewis*
Kelley Lewis, Attorney for Applicant
KLH Advisors PLLC
1940 West Dickerson Street, Suite 206
Bozeman, MT 59718
Telephone: (406) 577-2119
Email: klh@klhadvisors.com

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MAR 31 2026

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

Page 3 of 3

342-2026

Notice of Application

Published in Helena Independent Record on March 17, 2026

Location

Lewis and Clark County, Montana

Notice Text

Topic 1-24H

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

In the Matter of the Application of CONTINENTAL RESOURCES, INC. for a
Permit to Drill a horizontal oil and gas well.

1.Name and Address of Applicant:

Continental Resources, Inc.

P.O. Box 269000

Oklahoma City, Oklahoma 73126 (405) 234-9000 phone/fax

2. Well Name and Legal Description: Topic 1-24H

Surface Hole Location: 295' FSL & 1378' FWL, SESW Sec 19-25N-57E

Horizontal Intercept: 1370' FSL & 200' FEL, NESE Sec 24-25N-56E

Horizontal Terminus: 1370 FSL & 200 FWL, NWNE Sec 22-25N-56E County:

Richland

Proposed Total Depth: (1) 26435 MD; 10254 TVD

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

Montana Board of Oil and Gas Conservation

2535 St. John s Avenue

Billings, Montana 59102

Phone Number: (406) 656-0040

FAX Number: (406) 652-5305

March 17, 2026 COL-MT-202384 MNAXLP

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MAR 31 2026

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

342-2026

Notice of Application

Published in Sidney Herald on March 21, 2026

Location

Richland County, Montana

Notice Text

Topic 1-24H

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

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

In the Matter of the Application of CONTINENTAL RESOURCES, INC. for a Permit to Drill a horizontal oil and gas well.

1.Name and Address of Applicant:

Continental Resources, Inc.

P.O. Box 269000

Oklahoma City, Oklahoma 73126 (405) 234-9000 phone/fax

2. Well Name and Legal Description: Topic 1-24H

Surface Hole Location: 295' FSL & 1378' FWL, SESW Sec 19-25N-57E

Horizontal Intercept: 1370' FSL & 200' FEL, NESE Sec 24-25N-56E

Horizontal Terminus: 1370 FSL & 200 FWL, NWNE Sec 22-25N-56E County:

Richland

Proposed Total Depth: (1) 26435 MD; 10254 TVD

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

Montana Board of Oil and Gas Conservation

2535 St. John s Avenue

Billings, Montana 59102

Phone Number: (406) 656-0040

FAX Number: (406) 652-5305

Date: March 21, 2026

SHM000816

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MAR 31 2026

MONTANA BOARD OF OIL & GAS CONSERVATION • BILLINGS

342-2026

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

<p>REGARDING CONTINENTAL RESOURCES, INC. APPLICATION FOR PERMIT TO DRILL OIL AND GAS WELL WIGGINS 1-25H COMPRISED OF SECTIONS 25, 26, 27, AND 28, TOWNSHIP 25 NORTH, RANGE 56 EAST, RICHLAND COUNTY, MONTANA, AS PUBLISHED IN THE HELENA INDEPENDENT ON MARCH 17, 2026 AND THE SIDNEY HERALD ON MARCH 21, 2026.</p>	<p>DEMAND FOR OPPORTUNITY TO BE HEARD CONCERNING CONTINENTAL RESOURCES, INC.'S APPLICATION FOR PERMIT TO DRILL</p>
---	---

Pursuant to Montana Administrative Rule § 36.22.601, Phoenix Operating LLC, 4643 South Ulster Street, Suite 1510, Denver, Colorado, 80237, Phone No. (303) 749-0074 ("Phoenix"), demands an opportunity to be heard concerning an application for permit to drill shown in the Notices of Intention to Apply for Permit to Drill Oil and Gas Well, published by Continental Resources, Inc. ("Continental") in the Helena Independent on March 17, 2026, and the Sidney Herald on March 21, 2026 ("Continental APD"). The Continental APD is for one (1) well to be drilled within a non-existing temporary spacing unit ("TSU") comprised of Sections 25, 26, 27, and 28, Township 25 North, Range 56 East, Richland County, Montana. This demand is timely per A.R.M. § 36.22.601(6)(d). *Enclosed are copies of Continental's published notices with the applicable well name.*

1. The Montana Board of Oil and Gas Conservation ("MBOGC" and the "Board") has not previously established a TSU or approved the proposed TSU comprised of Sections 25, 26, 27, and 28, Township 25 North, Range 56 East, Richland County, Montana, scheduled for the April Docket at Docket No. 277-2026.
2. Phoenix has proposed an alternative plan of development that includes portions of Sections 25, 26, 27, and 28, Township 25 North, Range 56 East, Richland County, Montana, which is also scheduled for the April 2026 Docket at Docket Nos. 279-2026, 283-2026, and 285-2026.
3. To the extent that the MBOGC examines other factors in approving an APD, Phoenix owns 42.053% of the working interest in Sections 25, 26, 27, and 28, Township 25 North, Range 56 East, Richland County, Montana. Furthermore, Phoenix plans to develop the underlying pool in an orderly manner alongside other development in the area. Continental's APD fails to adequately protect correlative rights or promote maximum efficient recovery of oil and gas in the State of Montana, and the APD is not tied to an existing TSU.

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Page 1 of 3

MAR 31 2026

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

343-2026

Accordingly, for the foregoing reasons, among others, denying the Continental APD is consistent with the Board's prior decisions and regulations and will ensure that Sections 25, 26, 27, and 28, Township 25 North, Range 56 East, Richland County, Montana, are developed in a manner that promotes maximum efficient recovery, protects correlative rights, and prevents waste.

WHEREFORE, Phoenix respectfully requests the following relief:

1. That the Continental APD be referred to the MBOGC for notice and public hearing as required by A.R.M. § 36.22.601(4)(a);
2. That after hearing the MBOGC enter an Order denying Continental's APD;
3. The MBOGC enter an Order granting Phoenix's plan of development, which includes Docket Nos. 279-2026, 283-2026, and 285-2026; and
4. For such other relief as the MBOGC may deem appropriate.

DATED this 27th day of March 2026.

PHOENIX OPERATING LLC

By *Kelley Huemoeller Lewis*
Kelley Lewis, Attorney for Applicant
KLH Advisors PLLC
1940 West Dickerson Street, Suite 206
Bozeman, MT 59718
Telephone: (406) 577-2119
Email: klh@klhadvisors.com

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MAR 31 2026

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

Page 2 of 3

343-2026

CERTIFICATE OF SERVICE

I, Kelley Huemoeller Lewis, in accordance with A.R.M. § 36.22.601(6)(e), hereby certify that the foregoing demand for opportunity to be heard was served on this 27th day of March, 2026, addressed to the following:

Mr. Ben Jones
Administrator
Montana Board of Oil and Gas Conservation
2535 St. Johns Avenue
Billings, MT 59102
Fax No. (406) 652-5305
Via Fax, with a copy sent via electronic mail to bjones@mt.gov

Continental Resources, Inc.
Attn: Scotti Gray
P.O. Box 268870
Oklahoma City, Oklahoma 73126
Fax No. (405) 234-9562
Via Fax, with a copy sent via certified mail and electronic mail to scotti@graylawmt.com

By *Kelley Huemoeller Lewis*
Kelley Lewis, Attorney for Applicant
KLH Advisors PLLC
1940 West Dickerson Street, Suite 206
Bozeman, MT 59718
Telephone: (406) 577-2119
Email: klh@klhadvisors.com

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MAR 31 2026

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

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343-2026

Notice of Application

Published in Helena Independent Record on March 17, 2026

Location

Lewis and Clark County, Montana

Notice Text

Wiggins 1-25H

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

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

In the Matter of the Application of CONTINENTAL RESOURCES, INC. for a Permit to Drill a horizontal oil and gas well.

1. Name and Address of Applicant:

Continental Resources, Inc.

P.O. Box 269000

Oklahoma City, Oklahoma 73126

(405) 234-9000 phone/fax

2. Well Name and Legal Description: Wiggins 1-25H

Surface Hole Location: 295' FSL & 1442' FWL, SESW Sec 19-25N-57E

Horizontal Intercept: 1320' FNL & 200' FEL, NENE Sec 25-25N-56E

Horizontal Terminus: 1320 FNL & 200 FWL, NWNW Sec 28-25N-56E

County: Richland

Proposed Total Depth: (1) 31807 MD; 10224 TVD

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

Montana Board of Oil and Gas Conservation 2535 St. John s Avenue

Billings, Montana 59102

Phone Number: (406) 656-0040

FAX Number: (406) 652-5305

March 17, 2026 COL-MT-202386 MNAXLP

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MAR 31 2026

MONTANA BOARD OF OIL & GAS CONSERVATION • BILLINGS

343-2026

Notice of Application

Published in Sidney Herald on March 21, 2026

Location

Richland County, Montana

Notice Text

Wiggins 1-25H

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

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

In the Matter of the Application of CONTINENTAL RESOURCES, INC. for a Permit to Drill a horizontal oil and gas well.

1. Name and Address of Applicant:

Continental Resources, Inc.

P.O. Box 269000

Oklahoma City, Oklahoma 73126

(405) 234-9000 phone/fax

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County: Richland

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Montana Board of Oil and Gas Conservation 2535 St. John s Avenue
Billings, Montana 59102

Phone Number: (406) 656-0040

FAX Number: (406) 652-5305

Date: March 21, 2026

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