

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

IN THE MATTER OF THE APPLICATION OF KRAKEN OIL & GAS LLC FOR AN ORDER CREATING A TEMPORARY SPACING UNIT ("TSU") COMPRISED OF ALL OF SECTION 31, TOWNSHIP 23 NORTH, RANGE 59 EAST, M.P.M., RICHLAND COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT ANY LOCATION NOT CLOSER THAN 200' (HEEL/TOE SETBACK)/500' (LATERAL SETBACK) TO THE BOUNDARIES OF SAID TSU, AND SUCH OTHER AND FURTHER RELIEF AS THE MBOGC MAY DEEM APPROPRIATE

**MBOGC DOCKET NO. 316-2025**

**APPLICATION**

**RECEIVED**

**SEP 08 2025**

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

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

**[A] Presents the following application:**

1. Applicant is an interest owner within all or portions of Section 31, Township 23 North, Range 59 East, M.P.M., Richland County, Montana. Said Section 31 is not presently subject to any specific MBOGC Orders.
2. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill a horizontal Bakken/Three Forks formation well at a location within, but not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries of, a TSU comprised of All of Section 31, Township 23 North, Range 59 East, M.P.M.
3. Applicant will, within 90 days of successful completion of the proposed horizontal operation, file an application for Board consideration of permanent spacing and other matters relating to production from said well.
4. Applicant notes that there do not appear to be any federal minerals affected by this application.

**[B] Requests:**

1. This matter be set for hearing, with notice given as required by law and the MOU;
2. After hearing the matter, the Board enter its order creating a TSU comprised of All of Section 31, Township 23 North, Range 59 East, M.P.M., Richland County, Montana, and authorizing the drilling of a horizontal Bakken/Three Forks formation well at any location within such TSU but not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries thereof, providing that operations for the drilling of such well must be commenced within two years from the date of such order.

DATED this 3<sup>rd</sup> day of September, 2025.

**KRAKEN OIL & GAS LLC**

By \_\_\_\_\_

John R. Lee, Its Attorney

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

# GRAY LAW FIRM PLLC

ATTORNEY AT LAW

3471 MASTERTSON CIRCLE  
BILLINGS, MONTANA 59106  
(406) 248-4141  
scotti@graylawmt.com

January 6, 2026

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JAN 06 2026

MONTANA BOARD OF OIL &  
GAS CONSERVATION • BILLINGS

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

**RE: Permit Protest re In the Matter of Application for Permit to Drill an Oil & Gas Well by Kraken Operating, LLC with the legal description of "Surface Loc: SWSE Section 30, T26N, R58E, Richland County, MT. Footages: 343' FSL & 2245' FEL el:2176' Bottom hole loc: Lot 1 Section 18, T26N, R58E, Richland County, MT. Footages 205' FNL & 630 FWL'"**

Mr. Jones,

Continental Resources, Inc. ("Continental"), 20 N. Broadway, Oklahoma City, OK 73102, hereby protests and requests a hearing on the application of Kraken Operating LLC ("Kraken") for a permit to drill an oil and gas well at the following location:

Surface Loc: SWSE Section 30, T26N, R58E, Richland County, MT  
Footages: 343' FSL & 2245' FEL El 2176'

Bottom Hole Loc: Lot 1 Section 18, T26N, R58E, Richland County, MT.

Footages: 205' FNL & 630' FWL

Total Depth Proposed to be Drilled: 26,327 Measured Depth, 10,290 TVD ("Kraken Permit").

Continental protests the Kraken Permit on the following grounds:

- 1) Continental owns an approximate 22% interest in the spacing unit comprised of Sections 18, 19, 30, Township 26 North, Range 58 East, Richland County, Montana.
- 2) The record will show that approval of the Kraken Permit would disrupt orderly development, promote waste and impair correlative rights contrary to Title 82, MCA.
- 3) Continental intends to develop the spacing unit comprised of Sections 18, 19, 30, T26N, R58E in a manner that produces mineral resources efficiently and without waste, while planning for long term development success.

5 1 - 2 0 2 6

- 4) Continental has drilled and completed thousands of wells in the Bakken/Three Forks formation with demonstrated commercial success and repeatable results.
- 5) I can be reached at (406) 248-4141 and Continental's representative, Blaine Dutchik, can be reached at (405) 234-9327.

Sincerely,

GRAY LAW, P.L.L.P.

  
SCOTTI GRAY

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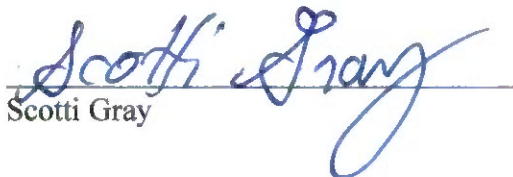
**CERTIFICATE OF SERVICE**

MONTANA BOARD OF OIL &  
GAS CONSERVATION • BILLINGS

I hereby certify that that on the 5th day of January 2026, I served a true and correct copy of the foregoing document to the following:

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

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

  
\_\_\_\_\_  
Scotti Gray

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RECEIVED

JAN 12 2026

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

MONTANA BOARD OF OIL &  
GAS CONSERVATION • BILLINGS

IN THE MATTER OF THE APPLICATION OF DEVON ENERGY WILLISTON, L.L.C., FOR AN ORDER CREATING A PERMANENT SPACING UNIT ("PSU") COMPRISED OF ALL OF SECTIONS 23, 24, 25, 26, 35 AND 36, TOWNSHIP 28 NORTH, RANGE 59 EAST, M.P.M., ROOSEVELT COUNTY, MONTANA, FOR THE PRODUCTION OF OIL AND ASSOCIATED NATURAL GAS FROM THE BAKKEN/THREE FORKS FORMATION FROM APPLICANT'S CHALLENGER 23-35F 2H; CHALLENGER 23-35F 3H; CHALLENGER 23-35F 4H; CHALLENGER 23-35F 5H; & CHALLENGER 24-36F 6H WELLS, AND ANY OTHER RELIEF THAT THE MBOGC MAY DEEM APPROPRIATE.

MBOGC DOCKET NO. 56-2026  
APPLICATION

DEVON ENERGY WILLISTON, L.L.C., 333 WEST SHERIDAN AVE., OKLAHOMA CITY, OK 73102:

[A] Presents the following application:

1. Applicant is an interest owner and operator within the above-described lands, and its Challenger 23-35F 2H; Challenger 23-35F 3H; Challenger 23-35F 4H; Challenger 23-35F 5H; and Challenger 24-36F 6H wells have been successfully completed as commercial producers of oil and associated natural gas from the Bakken/Three Forks formation thereunder.

2. To more efficiently and economically develop the reservoir, and to protect correlative rights of all owners in the captioned lands, all of Sections 23, 24, 25, 26, 35 and 36, Township 28 North, Range 59 East, M.P.M., Roosevelt County, Montana, should be designated a PSU for the production of oil and associated natural gas from the Bakken/Three Forks formation from Applicant's Challenger 23-35F 2H; Challenger 23-35F 3H; Challenger 23-35F 4H; Challenger 23-35F 5H; and Challenger 24-36F 6H wells.


[B] Requests:

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

2. After hearing the matter, the Board enter an order (i) designating all of Sections 23, 24, 25, 26, 35 and 36, Township 28 North, Range 59 East, M.P.M., Roosevelt County, Montana, a PSU for the production of oil and associated natural gas from the Bakken/Three Forks formation from Applicant's Challenger 23-35F 2H; Challenger 23-35F 3H; Challenger 23-35F 4H; Challenger 23-35F 5H; and Challenger 24-36F 6H wells; and (ii) any other relief as the Board may deem appropriate.

Dated this 6<sup>th</sup> day of January, 2026.

DEVON ENERGY WILLISTON, L.L.C.

By   
Uriah J. Price, Its Attorney  
Crowley Fleck, PLLP  
P. O. Box 10969  
Bozeman, MT 59719  
[uprice@crowleyfleck.com](mailto:uprice@crowleyfleck.com)

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JAN 12 2026

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

MONTANA BOARD OF OIL &  
GAS CONSERVATION • BILLINGS

IN THE MATTER OF THE APPLICATION OF DEVON ENERGY WILLISTON, L.L.C., FOR AN ORDER POOLING ALL INTERESTS IN THE PERMANENT SPACING UNIT ("PSU") COMPRISED OF ALL OF SECTIONS 23, 24, 25, 26, 35 AND 36, TOWNSHIP 28 NORTH, RANGE 59 EAST, M.P.M., ROOSEVELT COUNTY, MONTANA, FOR THE PRODUCTION OF OIL AND ASSOCIATED NATURAL GAS FROM THE BAKKEN/THREE FORKS FORMATION FROM APPLICANT'S CHALLENGER 23-35F 2H; CHALLENGER 23-35F 3H; CHALLENGER 23-35F 4H; CHALLENGER 23-35F 5H; & CHALLENGER 24-36F 6H WELLS, AND ANY OTHER RELIEF THAT THE MBOGC MAY DEEM APPROPRIATE.

MBOGC DOCKET NO. 57-2026

APPLICATION

DEVON ENERGY WILLISTON, L.L.C., 333 WEST SHERIDAN AVE., OKLAHOMA CITY, OK 73102:

[A] Presents the following application:

1. Applicant is an interest owner and operator within the above-described lands, and its Challenger 23-35F 2H; Challenger 23-35F 3H; Challenger 23-35F 4H; Challenger 23-35F 5H; and Challenger 24-36F 6H wells have been successfully completed as commercial producers of oil and associated natural gas from the Bakken/Three Forks formation thereunder.

2. It is anticipated that the captioned lands will comprise a PSU for purposes of Bakken/Three Forks formation production, as to Applicant's Challenger 23-35F 2H; Challenger 23-35F 3H; Challenger 23-35F 4H; Challenger 23-35F 5H; and Challenger 24-36F 6H wells, pursuant to Montana Board of Oil and Gas Conservation Order No. \_\_\_ -2026.

3. As of the date of this application, Applicant has been unable to establish voluntary pooling of all interests within the PSU with respect to the Challenger 23-35F 2H; Challenger 23-35F 3H; Challenger 23-35F 4H; Challenger 23-35F 5H; and Challenger 24-36F 6H wells, and it is anticipated that such pooling cannot be consummated prior to the hearing on this application.

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


[B] Requests:

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

2. After hearing the matter, the Board enter an order (i) pooling all interests in the PSU comprised of all of Sections 23, 24, 25, 26, 35 and 36, Township 28 North, Range 59 East, M.P.M., Roosevelt County, Montana, for the production of oil and associated natural gas from the Bakken/Three Forks formation from Applicant's Challenger 23-35F 2H; Challenger 23-35F 3H; Challenger 23-35F 4H; Challenger 23-35F 5H; and Challenger 24-36F 6H wells; and (ii) any other relief as the Board may deem appropriate.

Dated this 6<sup>th</sup> day of January, 2026.

**DEVON ENERGY WILLISTON, L.L.C.**

By   
Uriah J. Price, Its Attorney  
Crowley Fleck, PLLP  
P. O. Box 10969  
Bozeman, MT 59719  
[uprice@crowleyfleck.com](mailto:uprice@crowleyfleck.com)

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**JAN 12 2026**

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

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

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

IN THE MATTER OF THE APPLICATION OF KRAKEN OIL & GAS LLC FOR AN ORDER CREATING A TEMPORARY SPACING UNIT ("TSU") COMPRISED OF ALL OF SECTION 36, TOWNSHIP 28 NORTH, RANGE 55 EAST, M.P.M., AND ALL OF SECTIONS 31 AND 32, TOWNSHIP 28 NORTH, RANGE 56 EAST, M.P.M., ROOSEVELT COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT ANY LOCATION NOT CLOSER THAN 200' (HEEL/TOE SETBACK)/500' (LATERAL SETBACK) TO THE BOUNDARIES OF SAID TSU, PARTIALLY VACATING MBOGC ORDER NO. 380-2011, AND SUCH OTHER AND FURTHER RELIEF AS THE MBOGC MAY DEEM APPROPRIATE

BLM DOCKET NO. 17-2026

MBOGC DOCKET NO. 90-2026

APPLICATION

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

[A] Presents the following application:

1. Applicant is an interest owner within all or portions of Section 36, Township 28 North, Range 55 East, M.P.M., and Sections 31 and 32, Township 28 North, Range 56 East, M.P.M., Roosevelt County, Montana. Said Sections 36, 31 and 32 are presently subject only to the area-wide rule for Bakken/Three Forks production, MBOGC Order No. 380-2011.

2. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill a horizontal Bakken/Three Forks formation well at a location within, but not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries of, a TSU comprised of All of Section 36, Township 28 North, Range 55 East, M.P.M., and Sections 31 and 32, Township 28 North, Range 56 East, M.P.M. In order to grant the requested relief, it will be necessary to vacate MBOGC Order No. 380-2011 with respect to said Sections 36, 31 and 32.

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

4. A portion of the subject lands is Indian land, namely the SE/4SE/4 of Section 32, Township 28 North, Range 56 East, M.P.M., and accordingly, the MOU between the United States BLM and the MBOGC is applicable hereto.

[B] Requests:

1. This matter be set for hearing in conjunction with the MBOGC hearings to be held February 12, 2026, with notice given as required by law and the MOU; and

2. After hearing the matter, the BLM and MBOGC enter their respective orders (i) creating a TSU comprised of All of Section 36, Township 28 North, Range 55 East, M.P.M., and Sections 31 and 32, Township 28 North, Range 56 East, M.P.M., Roosevelt County, Montana, and authorizing the drilling of a horizontal Bakken/Three Forks formation well at any location within such TSU but not closer than 200' (heel/toe setback)/500'

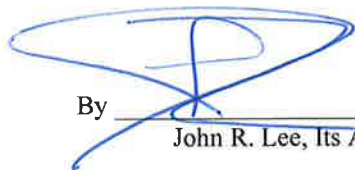
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(lateral setback) to the exterior boundaries thereof, providing that operations for the drilling of such well must be commenced not later than the date of the Board's regularly-scheduled February 2027 hearings, and (ii) vacating MBOGC Order No. 380-2011 with respect said Sections 36, 31 and 32.

DATED this 7<sup>th</sup> day of January, 2026.

**KRAKEN OIL & GAS LLC**



By \_\_\_\_\_

John R. Lee, Its Attorney

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

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MONTANA BOARD OF OIL &  
GAS CONSERVATION • BILLINGS

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

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

IN THE MATTER OF THE APPLICATION OF KRAKEN OIL & GAS LLC FOR AN ORDER AUTHORIZING THE DRILLING OF UP TO THREE ADDITIONAL HORIZONTAL BAKKEN/THREE FORKS FORMATION WELLS IN THE TEMPORARY SPACING UNIT ("TSU") COMPRISED OF ALL OF SECTION 36, TOWNSHIP 28 NORTH, RANGE 55 EAST, M.P.M., AND ALL OF SECTIONS 31 AND 32, TOWNSHIP 28 NORTH, RANGE 56 EAST, M.P.M., ROOSEVELT COUNTY, MONTANA, AT ANY LOCATIONS NOT CLOSER THAN 200' (HEEL/TOE SETBACK)/500' (LATERAL SETBACK) TO THE BOUNDARIES THEREOF, AND SUCH OTHER AND FURTHER RELIEF AS THE MBOGC MAY DEEM APPROPRIATE

BLM DOCKET NO. 18-2026

MBOGC DOCKET NO. 91-2026

APPLICATION

\*\*\*\*\*

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

[A] Presents the following application:

1. Applicant is an interest owner and operator within all or portions of Section 36, Township 28 North, Range 55 East, M.P.M., and Sections 31 and 32, Township 28 North, Range 56 East, M.P.M., Roosevelt County, Montana. It is anticipated that said lands will comprise a temporary spacing unit ("TSU") for purposes of Bakken/Three Forks formation production pursuant to Montana Board of Oil and Gas Conservation Order No. \_\_-2026.
2. Applicant requests authority to drill up to three additional horizontal Bakken/Three Forks formation wells within said TSU, at any locations not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries thereof, if in its judgment as operator of the TSU such operations appear reasonable and prudent.
3. A portion of the subject lands is Indian land, namely the SE/4SE/4 of Section 32, Township 28 North, Range 56 East, M.P.M., and accordingly, the MOU between the United States BLM and the MBOGC is applicable hereto.

[B] Requests:

1. This matter be set for hearing in conjunction with the MBOGC hearings to be held February 12, 2026, with notice given as required by law and the MOU; and
2. After hearing the matter, the BLM and MBOGC enter their respective orders authorizing the Applicant to drill up to three additional horizontal Bakken/Three Forks formation wells at any locations within, but not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries of, the TSU comprised of All of Section 36, Township 28 North, Range 55 East, M.P.M., and Sections 31 and 32, Township 28 North, Range 56 East, M.P.M., Roosevelt County, Montana.

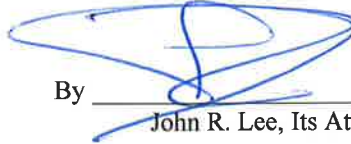
DATED this 7<sup>th</sup> day of January, 2026.

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JAN 09 2026

MONTANA BOARD OF OIL &  
GAS CONSERVATION • BILLINGS

**KRAKEN OIL & GAS LLC**



By \_\_\_\_\_

John R. Lee, Its Attorney

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

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**JAN 09 2026**

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

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

IN THE MATTER OF THE APPLICATION OF CONTINENTAL RESOURCES INC. FOR AN ORDER DESIGNATING A TEMPORARY SPACING UNIT COMPRISED OF ALL OF SECTIONS 13, 24, AND 25, TOWNSHIP 27 NORTH, RANGE 55 EAST, RICHLAND COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT ANY LOCATION NOT CLOSER THAN 200 FEET FROM HEEL/TOE BOUNDARY AND 500 FEET FROM THE SIDE BOUNDARIES OF SAID TEMPORARY SPACING UNIT, PROVIDED THAT OPERATIONS FOR THE DRILLING OF SAID WELL MUST COMMENCE WITHIN ONE YEAR OF THE DATE OF THE ORDER ISSUED BY THE BOARD, THE TEMPORARY SPACING UNIT SHALL BE LIMITED TO PRODUCTION FROM THE PROPOSED HORIZONTAL WELL AND APPLICANT WILL APPLY FOR PERMANENT SPACING WITHIN 90 DAYS OF SUCCESSFUL WELL COMPLETION.

MBOGC Docket No.

1908-2026

AMENDED APPLICATION

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JAN 12 2026

MONTANA BOARD OF OIL & GAS CONSERVATION • BILLINGS, MONTANA

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

**[A] Presents the following application:**

1. Applicant is an interest owner and operator within Sections 13, 24 and 25, Township 27 North, Range 55 East, Richland County, Montana, which tracts are presently unspaced with respect to the Bakken/Three Forks Formation by Order:
2. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill a horizontal Bakken/Three Forks formation well within, but not closer than 200 feet to the heel/toe exterior boundaries and 500 feet to the lateral boundaries, of a temporary spacing unit ("TSU") comprised of Sections 13, 24 and 25, Township 27 North, Range 55 East, Richland County, Montana, subject to the conditions that applicant must commence said well within one year of the date of the order issued by the Board and that the temporary spacing unit be limited to production from the proposed horizontal well.
3. The requested spacing unit contains the following Federal lands:

Township 27 North, Range 55 East

Section 13: All

Section 24: N2, N2S2, SESW, S2SE

Section 25: NE, NESE

**[B] Requests:**

1. This matter be set for hearing and placed on the Docket, with notice given as required by law.
2. After hearing the matter, the Montana Board of Oil & Gas Conservation enter its order that a TSU comprised of Sections 13, 24 and 25, Township 27 North, Range 55 East, Richland County, Montana be established, subject to the condition that applicant must commence said well within one year of the date of the order issued by the Board;

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

Dated January 12, 2026.

CONTINENTAL RESOURCES INC.

By   
Scotti Gray  
Attorney for Applicant

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JAN 12 2026

MONTANA BOARD OF OIL &  
GAS CONSERVATION • BILLINGS

188 - 2026

BOARD OF OIL AND GAS CONSERVATION  
OF THE STATE OF MONTANA

IN THE MATTER OF THE APPLICATION  
OF CONTINENTAL RESOURCES INC.  
FOR AUTHORIZATION TO DRILL UP TO  
THREE ADDITIONAL HORIZONTAL  
BAKKEN/THREE FORKS FORMATION  
WELLS IN THE SPACING UNIT  
COMPRISED OF ALL OF SECTIONS 13,  
24, AND 25, TOWNSHIP 27 NORTH,  
RANGE 55 EAST, RICHLAND COUNTY,  
MONTANA, AT ANY LOCATION NOT  
CLOSER THAN 500 FEET TO THE SIDE  
BOUNDARIES AND 200 FEET TO THE  
TOE/HEEL BOUNDARIES OF SAID  
SPACING UNIT

MBOGC Docket No. 189-2026

APPLICATION

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JAN 08 2026

MONTANA BOARD OF OIL &  
GAS CONSERVATION • BILLINGS

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

**[A] Presents the following application:**

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

Township 27 North, Range 55 East

Section 13: All

Section 24: N2, N2S2, SESW, S2SE

Section 25: NE, NESE

**[B] Requests:**

1. This matter be set for hearing and placed on the Docket, with notice given as required by law.
2. After hearing the matter, the Board enter its order authorizing applicant to drill up to 3 additional horizontal Bakken/Three Forks formation wells within, but not closer than 500 feet to the side boundaries and 200 feet to the toe/heel boundaries of the spacing unit.

Dated January 7, 2026.

CONTINENTAL RESOURCES INC.

By

Scotti Gray  
Scotti Gray

Attorney for Applicant

BOARD OF OIL AND GAS CONSERVATION  
OF THE STATE OF MONTANA

IN THE MATTER OF THE APPLICATION OF  
CONTINENTAL RESOURCES INC. FOR AN ORDER  
DESIGNATING A TEMPORARY SPACING UNIT  
COMPRISED OF

TOWNSHIP 28 NORTH, RANGE 55 EAST,  
ROOSEVELT COUNTY, MONTANA

SECTION 27: ALL

SECTION 34: LOTS 1, 2, 5, 6, 10, N2NE, SENE, ANY  
AND ALL STATE INTEREST UNDER THE MISSOURI  
RIVERBED AND RELATED ACREAGE

TOWNSHIP 28 NORTH, RANGE 55 EAST, RICHLAND  
COUNTY, MONTANA

SECTION 34: LOTS 3, 4, 7, 8, 9, NWSW, S2SW, ANY  
AND ALL STATE INTEREST UNDER THE MISSOURI  
RIVERBED AND RELATED ACREAGE, PART OF  
ATTACHED ISLAND AND ACCRETIONS (SE), PART  
OF REMNANT ACCRETIONS TO FORMER ISLAND  
(SW)

TOWNSHIP 27 NORTH, RANGE 55 EAST,  
ROOSEVELT COUNTY, MONTANA

SECTION 3: LOTS 1, 6, 7, 10, PART OF ATTACHED  
ISLAND AND ACCRETIONS (SE), MISSOURI  
RIVERBED AND RELATED ACREAGE

SECTION 10: LOT 1, PART OF ATTACHED ISLANDS  
AND ACCRETIONS TO IT (NE), MISSOURI  
RIVERBED AND RELATED ACREAGE

TOWNSHIP 27 NORTH, RANGE 55 EAST, RICHLAND  
COUNTY, MONTANA

SECTION 3: LOTS 2, 3, 4, 5, 8, 9, S2NW, SW, PART OF  
ACCRETIONS TO ATTACHED ISLAND, MISSOURI  
RIVERBED AND RELATED ACREAGE

SECTION 10: LOTS 2, 3, 4, NW, S2, MISSOURI  
RIVERBED AND RELATED ACREAGE

AND AUTHORIZING THE DRILLING OF A  
HORIZONTAL BAKKEN/THREE FORKS FORMATION  
WELL THEREON AT ANY LOCATION NOT CLOSER  
THAN 200 FEET FROM HEEL/TOE BOUNDARY AND  
500 FEET FROM THE SIDE BOUNDARIES OF SAID  
TEMPORARY SPACING UNIT, PROVIDED THAT  
OPERATIONS FOR THE DRILLING OF SAID WELL  
MUST COMMENCE WITHIN ONE YEAR OF THE  
DATE OF THE ORDER ISSUED BY THE BOARD, THE  
TEMPORARY SPACING UNIT SHALL BE LIMITED  
TO PRODUCTION FROM THE PROPOSED  
HORIZONTAL WELL AND APPLICANT WILL APPLY  
FOR PERMANENT SPACING WITHIN 90 DAYS OF  
SUCCESSFUL WELL COMPLETION.

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

**[A] Presents the following application:**

1. Applicant is an interest owner and operator within Sections 27 and 34, Township 28 North, Range 55 East, and Sections 3 and 10 Township 27 North, Range 55 East, which tracts are presently unspaced with respect to the Bakken/Three Forks Formation.

MBOGC Docket No.

194-2026

APPLICATION

39-2026 FED

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MONTANA BOARD OF OIL &  
GAS CONSERVATION • BILLINGS

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MONTANA BOARD OF OIL &  
GAS CONSERVATION • BILLINGS

2. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill a horizontal Bakken/Three Forks formation well within, but not closer than 200 feet to the heel/toe exterior boundaries and 500 feet to the lateral boundaries, of a temporary spacing unit ("TSU") comprised of Sections 27 and 34, Township 28 North, Range 55 East, and Sections 3 and 10 Township 27 North, Range 55 East, subject to the conditions that applicant must commence said well within one year of the date of the order issued by the Board and that the temporary spacing unit be limited to production from the proposed horizontal well.

3. The proposed spacing unit contains the following Indian Trust minerals:

Township 28 North, Range 55 East  
Section 27: Lots 4, 5, 8, 10, 11, W2SE

4. The proposed spacing unit contains the following Federal minerals:

Township 27 North, Range 55 East  
Section 10: Lot 4

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**[B] Requests:**

1. This matter be set for hearing and placed on the Docket, with notice given as required by law.
2. After hearing the matter, the Montana Board of Oil & Gas Conservation enter its order that a TSU comprised of All of Sections 27 and 34, Township 28 North, Range 55 East, and Sections 3 and 10 Township 27 North, Range 55 East (more particularly described above) be established, subject to the condition that applicant must commence said well within one year of the date of the order issued by the Board;
3. Authorizing the Applicant to locate its proposed horizontal well anywhere within such TSU but not closer than 200 feet to the toe/heel boundaries and no further than 500 feet from the common boundary thereof.

Dated January 7, 2026.

CONTINENTAL RESOURCES INC.

By Scott Gray  
Scott Gray  
Attorney for Applicant

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194 - 2026

BOARD OF OIL AND GAS CONSERVATION  
OF THE STATE OF MONTANA

IN THE MATTER OF THE APPLICATION OF  
CONTINENTAL RESOURCES INC. FOR  
AUTHORIZATION TO DRILL UP TO THREE  
ADDITIONAL HORIZONTAL  
BAKKEN/THREE FORKS FORMATION  
WELLS IN THE SPACING UNIT COMPRISED  
OF

TOWNSHIP 28 NORTH, RANGE 55 EAST, ROOSEVELT  
COUNTY, MONTANA

SECTION 27: ALL

SECTION 34: LOTS 1, 2, 5, 6, 10, N2NE, SENE, ANY AND  
ALL STATE INTEREST UNDER THE MISSOURI RIVERBED  
AND RELATED ACREAGE

TOWNSHIP 28 NORTH, RANGE 55 EAST, RICHLAND  
COUNTY, MONTANA

SECTION 34: LOTS 3, 4, 7, 8, 9, NWSW, S2SW, ANY AND  
ALL STATE INTEREST UNDER THE MISSOURI RIVERBED  
AND RELATED ACREAGE, PART OF ATTACHED ISLAND  
AND ACCRETIONS (SE), PART OF REMNANT  
ACCRETIONS TO FORMER ISLAND (SW)

TOWNSHIP 27 NORTH, RANGE 55 EAST, ROOSEVELT  
COUNTY, MONTANA

SECTION 3: LOTS 1, 6, 7, 10, PART OF ATTACHED ISLAND  
AND ACCRETIONS (SE), MISSOURI RIVERBED AND  
RELATED ACREAGE

SECTION 10: LOT 1, PART OF ATTACHED ISLANDS AND  
ACCRETIONS TO IT (NE), MISSOURI RIVERBED AND  
RELATED ACREAGE

TOWNSHIP 27 NORTH, RANGE 55 EAST, RICHLAND  
COUNTY, MONTANA

SECTION 3: LOTS 2, 3, 4, 5, 8, 9, S2NW, SW, PART OF  
ACCRETIONS TO ATTACHED ISLAND, MISSOURI  
RIVERBED AND RELATED ACREAGE

SECTION 10: LOTS 2, 3, 4, NW, S2, MISSOURI RIVERBED  
AND RELATED ACREAGE

AT ANY LOCATION NOT CLOSER THAN 500  
FEET TO THE SIDE BOUNDARIES AND 200  
FEET TO THE TOE/HEEL BOUNDARIES OF  
SAID SPACING UNIT

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

**[A] Presents the following application:**

1. Applicant is an interest owner and operator within the above-described lands:
2. The above-described lands are presently subject to a pending application to designate a temporary spacing unit ("TSU") comprised of said lands and authorize the drilling of a well in the TSU.

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APPLICATION 40-2026 FED

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GAS CONSERVATION • BILLINGS

3. The proposed spacing unit contains the following Indian Trust minerals:

Township 28 North, Range 55 East  
Section 27: Lots 4, 5, 8, 10, 11, W2SE

4. The proposed spacing unit contains the following Federal minerals:

Township 27 North, Range 55 East  
Section 10: Lot 4

5. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill up to 3 additional horizontal Bakken/Three Forks formation wells within, but not closer than 500 feet to the side boundaries and 200 feet to the toe/heel boundaries of the spacing unit.

**[B] Requests:**

1. This matter be set for hearing and placed on the Docket, with notice given as required by law.
2. After hearing the matter, the Board enter its order authorizing applicant to drill up to 3 additional horizontal Bakken/Three Forks formation wells within, but not closer than 500 feet to the side boundaries and 200 feet to the toe/heel boundaries of the spacing unit.

Dated January 7, 2026.

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CONTINENTAL RESOURCES INC.

By Scotti Gray  
Scotti Gray  
Attorney for Applicant

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BOARD OF OIL AND GAS CONSERVATION  
OF THE STATE OF MONTANA

IN THE MATTER OF THE APPLICATION OF  
CONTINENTAL RESOURCES INC. FOR AN ORDER  
DESIGNATING A TEMPORARY SPACING UNIT  
COMPRISED OF

MBOGC Docket No.	196-2026
APPLICATION	41-2026 FED

TOWNSHIP 28 NORTH, RANGE 55 EAST,  
ROOSEVELT COUNTY, MONTANA

SECTION 26: ALL  
SECTION 35: N2, SE, E2SW, W2SW LESS MISSOURI  
RIVER, MISSOURI RIVERBED AND RELATED  
ACREAGE

TOWNSHIP 28 NORTH, RANGE 55 EAST, RICHLAND  
COUNTY, MONTANA

SECTION 35: PART OF ACCRETIONS TO ATTACHED  
ISLAND (SW), MISSOURI RIVERBED AND RELATED  
ACREAGE

TOWNSHIP 27 NORTH, RANGE 55 EAST,  
ROOSEVELT COUNTY, MONTANA

SECTION 2: LOTS 1, 2, 3, 4, 5, 6, 7, S2NE, NWSE, S2NW,  
NESW, W2SW, PART OF ATTACHED ISLAND AND  
ACCRETIONS TO IT (SW), PART OF MID-CHANNEL  
ISLAND AND ACCRETIONS TO IT (SE), MISSOURI  
RIVERBED AND RELATED ACREAGE

SECTION 11: LOT 3, PART OF MID-CHANNEL  
ISLAND AND ACCRETIONS (NE), MISSOURI  
RIVERBED AND RELATED ACREAGE

TOWNSHIP 27 NORTH, RANGE 55 EAST, RICHLAND  
COUNTY, MONTANA

SECTION 2: LOT 8, PART OF ATTACHED ISLAND  
AND ACCRETIONS TO IT (NW), MISSOURI  
RIVERBED AND RELATED ACREAGE  
SECTION 11: LOTS 1, 2, 4, 5, 6, 7, 8, 9, S2NE, S2S2

AND AUTHORIZING THE DRILLING OF A  
HORIZONTAL BAKKEN/THREE FORKS FORMATION  
WELL THEREON AT ANY LOCATION NOT CLOSER  
THAN 200 FEET FROM HEEL/TOE BOUNDARY AND  
500 FEET FROM THE SIDE BOUNDARIES OF SAID  
TEMPORARY SPACING UNIT, PROVIDED THAT  
OPERATIONS FOR THE DRILLING OF SAID WELL  
MUST COMMENCE WITHIN ONE YEAR OF THE  
DATE OF THE ORDER ISSUED BY THE BOARD, THE  
TEMPORARY SPACING UNIT SHALL BE LIMITED  
TO PRODUCTION FROM THE PROPOSED  
HORIZONTAL WELL AND APPLICANT WILL APPLY  
FOR PERMANENT SPACING WITHIN 90 DAYS OF  
SUCCESSFUL WELL COMPLETION.

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

[A] **Presents the following application:**

1. Applicant is an interest owner and operator within Sections 26 and 35, Township 28 North, Range 55 East, and Sections 2 and 11, Township 27 North, Range 55 East, which tracts are presently unspaced with respect to the Bakken/Three Forks Formation.

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2. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill a horizontal Bakken/Three Forks formation well within, but not closer than 200 feet to the heel/toe exterior boundaries and 500 feet to the lateral boundaries, of a temporary spacing unit ("TSU") comprised of Sections 26 and 35, Township 28 North, Range 55 East, and Sections 2 and 11, Township 27 North, Range 55 East, subject to the conditions that applicant must commence said well within one year of the date of the order issued by the Board and that the temporary spacing unit be limited to production from the proposed horizontal well.

3. The proposed spacing unit contains the following Federal minerals:

Township 27 North, Range 55 East  
Section 11: Lot 8 (NESW), Lot 6 (NESE), S2SE, SESW

4. The proposed spacing unit contains the following Indian Trust minerals:

Township 27 North, Range 55 East  
Section 2: Lot 5, SENE, NESW, NWSE

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[B] **Requests:**

1. This matter be set for hearing and placed on the Docket, with notice given as required by law.
2. After hearing the matter, the Montana Board of Oil & Gas Conservation enter its order that a TSU comprised of the above-described lands be established, subject to the condition that applicant must commence said well within one year of the date of the order issued by the Board;
3. Authorizing the Applicant to locate its proposed horizontal well anywhere within such TSU but not closer than 200 feet to the toe/heel boundaries and no further than 500 feet from the common boundary thereof.

Dated January 7, 2026.

CONTINENTAL RESOURCES INC.

By Scotti Gray  
Scotti Gray  
Attorney for Applicant

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

IN THE MATTER OF THE APPLICATION OF  
CONTINENTAL RESOURCES INC. FOR  
AUTHORIZATION TO DRILL UP TO THREE  
ADDITIONAL HORIZONTAL  
BAKKEN/THREE FORKS FORMATION  
WELLS IN THE SPACING UNIT COMPRISED  
OF

TOWNSHIP 28 NORTH, RANGE 55 EAST, ROOSEVELT  
COUNTY, MONTANA

SECTION 26: ALL  
SECTION 35: N2, SE, E2SW, W2SW LESS MISSOURI RIVER,  
MISSOURI RIVERBED AND RELATED ACREAGE

TOWNSHIP 28 NORTH, RANGE 55 EAST, RICHLAND  
COUNTY, MONTANA

SECTION 35: PART OF ACCRETIONS TO ATTACHED  
ISLAND (SW), MISSOURI RIVERBED AND RELATED  
ACREAGE

TOWNSHIP 27 NORTH, RANGE 55 EAST, ROOSEVELT  
COUNTY, MONTANA

SECTION 2: LOTS 1, 2, 3, 4, 5, 6, 7, S2NE, NWSE, S2NW,  
NESW, W2SW, PART OF ATTACHED ISLAND AND  
ACCRETIONS TO IT (SW), PART OF MID-CHANNEL  
ISLAND AND ACCRETIONS TO IT (SE), MISSOURI  
RIVERBED AND RELATED ACREAGE

SECTION 11: LOT 3, PART OF MID-CHANNEL ISLAND  
AND ACCRETIONS (NE), MISSOURI RIVERBED AND  
RELATED ACREAGE

TOWNSHIP 27 NORTH, RANGE 55 EAST, RICHLAND  
COUNTY, MONTANA

SECTION 2: LOT 8, PART OF ATTACHED ISLAND AND  
ACCRETIONS TO IT (NW), MISSOURI RIVERBED AND  
RELATED ACREAGE

SECTION 11: LOTS 1, 2, 4, 5, 6, 7, 8, 9, S2NE, S2S2

AT ANY LOCATION NOT CLOSER THAN 500  
FEET TO THE SIDE BOUNDARIES AND 200  
FEET TO THE TOE/HEEL BOUNDARIES OF  
SAID SPACING UNIT

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

**[A] Presents the following application:**

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

MBOGC Docket No.

197-2026

APPLICATION

42-2026 FED

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4. The proposed spacing unit contains the following Federal minerals:

Township 27 North, Range 55 East  
Section 11: Lot 8 (NESW), Lot 6 (NESE), S2SE, SESW

5. The proposed spacing unit contains the following Indian Trust minerals:

Township 27 North, Range 55 East  
Section 2: Lot 5, SENE, NESW, NWSE

**[B] Requests:**

1. This matter be set for hearing and placed on the Docket, with notice given as required by law.
2. After hearing the matter, the Board enter its order authorizing applicant to drill up to 3 additional horizontal Bakken/Three Forks formation wells within, but not closer than 500 feet to the side boundaries and 200 feet to the toe/heel boundaries of the spacing unit.

Dated January 7, 2026.

CONTINENTAL RESOURCES INC.

By

  
Scotti Gray  
Attorney for Applicant

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197 - 2026

BOARD OF OIL AND GAS CONSERVATION  
OF THE STATE OF MONTANA

IN THE MATTER OF THE APPLICATION OF  
CONTINENTAL RESOURCES INC. FOR AN ORDER  
DESIGNATING A TEMPORARY SPACING UNIT  
COMPRISED OF

TOWNSHIP 28 NORTH, RANGE 55 EAST, ROOSEVELT  
COUNTY, MONTANA

SECTION 25: ALL  
SECTION 36: ALL

TOWNSHIP 27 NORTH, RANGE 55 EAST, ROOSEVELT  
COUNTY, MONTANA

SECTION 1: LOTS 1, 2, 3, 4, 5, 6, 7, 10, SWNW, NORTH HALF  
OF THE BED OF THE MISSOURI RIVER AND ISLANDS  
AND LANDS ACCRETTED THERETO

TOWNSHIP 27 NORTH, RANGE 55 EAST, RICHLAND  
COUNTY, MONTANA

SECTION 1: LOTS 8, 9, 11, 12, S2SE, SOUTH HALF OF THE  
BED OF THE MISSOURI RIVER, REMNANTS LOTS ½,  
ISLANDS AND LANDS ACCRETTED THERETO  
SECTION 12: ALL

AND AUTHORIZING THE DRILLING OF A HORIZONTAL  
BAKKEN/THREE FORKS FORMATION WELL THEREON  
AT ANY LOCATION NOT CLOSER THAN 200 FEET FROM  
HEEL/TOE BOUNDARY AND 500 FEET FROM THE SIDE  
BOUNDARIES OF SAID TEMPORARY SPACING UNIT,  
PROVIDED THAT OPERATIONS FOR THE DRILLING OF  
SAID WELL MUST COMMENCE WITHIN ONE YEAR OF  
THE DATE OF THE ORDER ISSUED BY THE BOARD, THE  
TEMPORARY SPACING UNIT SHALL BE LIMITED TO  
PRODUCTION FROM THE PROPOSED HORIZONTAL  
WELL AND APPLICANT WILL APPLY FOR PERMANENT  
SPACING WITHIN 90 DAYS OF SUCCESSFUL WELL  
COMPLETION.

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

**[A] Presents the following application:**

1. Applicant is an interest owner and operator within Sections 25 and 36, Township 28 North, Range 55 East, and Sections 1 and 12 Township 27 North, Range 55 East, which tracts are presently unspaced with respect to the Bakken/Three Forks Formation.
2. The proposed spacing unit contains the following Federal minerals:  
  
Township 27 North, Range 55 East  
Section 12: S2
3. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill a horizontal Bakken/Three Forks formation well within, but not closer than 200 feet to the heel/toe exterior boundaries and 500 feet to the lateral boundaries, of a temporary spacing unit ("TSU") comprised of All of Sections 25 and 36, Township 28 North, Range 55 East, and All of Sections 1 and 12, Township 27 North, Range 55 East, subject to the conditions that applicant must commence said well within one year of the date of the order issued by the Board and that the temporary spacing unit be limited to production from the proposed horizontal well.

MBOGC Docket No. 198-2026

APPLICATION

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GAS CONSERVATION • BILLINGS

[B] **Requests:**

1. This matter be set for hearing and placed on the Docket, with notice given as required by law.
2. After hearing the matter, the Montana Board of Oil & Gas Conservation enter its order that a TSU comprised of

TOWNSHIP 28 NORTH, RANGE 55 EAST,  
ROOSEVELT COUNTY, MONTANA  
SECTION 25: ALL  
SECTION 36: ALL

TOWNSHIP 27 NORTH, RANGE 55 EAST,  
ROOSEVELT COUNTY, MONTANA  
SECTION 1: LOTS 1, 2, 3, 4, 5, 6, 7, 10, SWNW,  
NORTH HALF OF THE BED OF THE MISSOURI  
RIVER AND ISLANDS AND LANDS ACCRETED  
THERETO

TOWNSHIP 27 NORTH, RANGE 55 EAST,  
RICHLAND COUNTY, MONTANA  
SECTION 1: LOTS 8, 9, 11, 12, S2SE, SOUTH HALF  
OF THE BED OF THE MISSOURI RIVER,  
REMNANTS LOTS ½, ISLANDS AND LANDS  
ACCRETED THERETO  
SECTION 12: ALL

be established, subject to the condition that applicant must commence said well within one year of the date of the order issued by the Board;

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

Dated January 7, 2026.

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CONTINENTAL RESOURCES INC.

By Scotti Gray  
Scotti Gray  
Attorney for Applicant

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

IN THE MATTER OF THE APPLICATION OF  
CONTINENTAL RESOURCES INC. FOR  
AUTHORIZATION TO DRILL UP TO THREE  
ADDITIONAL HORIZONTAL  
BAKKEN/THREE FORKS FORMATION  
WELLS IN THE SPACING UNIT COMPRISED  
OF

TOWNSHIP 28 NORTH, RANGE 55 EAST, ROOSEVELT  
COUNTY, MONTANA  
SECTION 25: ALL  
SECTION 36: ALL

TOWNSHIP 27 NORTH, RANGE 55 EAST, ROOSEVELT  
COUNTY, MONTANA  
SECTION 1: LOTS 1, 2, 3, 4, 5, 6, 7, 10, SWNW, NORTH HALF  
OF THE BED OF THE MISSOURI RIVER AND ISLANDS  
AND LANDS ACCRETTED THERETO

TOWNSHIP 27 NORTH, RANGE 55 EAST, RICHLAND  
COUNTY, MONTANA  
SECTION 1: LOTS 8, 9, 11, 12, S2SE, SOUTH HALF OF THE  
BED OF THE MISSOURI RIVER, REMNANTS LOTS ½,  
ISLANDS AND LANDS ACCRETTED THERETO  
SECTION 12: ALL

AT ANY LOCATION NOT CLOSER THAN 500  
FEET TO THE SIDE BOUNDARIES AND 200  
FEET TO THE TOE/HEEL BOUNDARIES OF  
SAID SPACING UNIT

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

**[A] Presents the following application:**

1. Applicant is an interest owner and operator within the above-described lands:
2. The above-described lands are presently subject to a pending application to designate a temporary spacing unit ("TSU") comprised of said lands and authorize the drilling of a well in the TSU.
3. The proposed spacing unit contains the following Federal minerals:

Township 27 North, Range 55 East  
Section 12: S2

3. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill up to 3 additional horizontal Bakken/Three Forks formation wells within, but not closer than 500 feet to the side boundaries and 200 feet to the toe/heel boundaries of the spacing unit.

**[B] Requests:**

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

MBOGC Docket No. 199-2026

APPLICATION

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2. After hearing the matter, the Board enter its order authorizing applicant to drill up to 3 additional horizontal Bakken/Three Forks formation wells within, but not closer than 500 feet to the side boundaries and 200 feet to the toe/heel boundaries of the spacing unit.

Dated January 7, 2026.

CONTINENTAL RESOURCES INC.

By Scotti Gray  
Scotti Gray  
Attorney for Applicant

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MONTANA BOARD OF OIL & GAS CONSERVATION • BILLINGS

# FAX

Date 01/25/2026

Number of pages including cover sheet: 9

To:

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\_\_\_\_\_  
\_\_\_\_\_

Phone

Fax Phone +14066525305

From:

Wendy Johnson  
Kearney McWilliams & Davis  
55 Waugh #150  
Houston TX  
77007

Phone +17139369620X134

Fax Phone +17135894199

## REMARKS:

Please see attached.

Sincerely,

Wendy A. Johnson  
Senior Attorney  
Licensed in Montana and Texas

<[223-2026](https://urldefense.com/v3/__http://www.kmd.law/__;!!H9pxQksFkm_10PXf!c0UAj6bLH2Nob8lySgntlBPUabQUszteBYvjU5oQriQTJm3pTtCleZ0ezQ9Ejcs6AB6nRLJ-3nArG4e6EFVd0-X5tg$></a><br/>Kearney, McWilliams & Davis, PLLC<br/>Houston: 55 Waugh #150, Houston, TX 77007<br/>Denver: 1625 Broadway #2950, Denver, CO 80202<br/>Dallas - Fort Worth: 1235 South Main #280, Grapevine, TX 76051<br/>San Antonio: 40 NE Loop 410 #431, San Antonio, TX 78216<br/>Sheridan: 110 S. Gould, 2nd Floor, Sheridan, WY 82801<br/>Cell: (406) 260-1770</p></div>
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GAS CONSERVATION • BILLINGS



223-2026

# KEARNEY MCWILLIAMS & DAVIS

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## ATTORNEYS AT LAW

**Denver:** 1625 Broadway, Suite 2950, Denver, CO 80202  
**Dallas • Fort Worth:** 1235 South Main #280, Grapevine, TX 76051  
**Houston:** 55 Waugh, Suite 150, Houston, TX 77007  
**San Antonio:** 40 N.E. Loop 410, Suite 431, San Antonio, TX 78216  
**Sheridan:** 110 S. Gould St., 2<sup>nd</sup> Floor, Sheridan, WY 82801

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ND NE NM NY OK TX UT WY & USPTO  
**Phone:** (888) 855-1276  
**Fax:** (713) 936-9621  
admin@kmd.law

**January 25, 2026**

Attention : Ben Jones, Administrator/Petroleum Engineer

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

Fax # : 406-652-5305

Re: Phoenix Operating LLC - Demand for Opportunity to be Heard concerning  
Continental Resources, Inc.'s Application for Permit to Drill (Whale 1-25H),  
Published January 15, 2025.

Dear Mr. Jones,

Pursuant to Administrative Rule of Montana § 36.22.601, Phoenix Operating LLC ("Phoenix"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, hereby demands an opportunity to be heard regarding the Application for Permit to Drill ("APD") an Oil and Gas Well, published by Continental Resources, Inc. ("Continental") in the Helena Independent Record, on January 15, 2026 (hereinafter referred to as the "Continental APD"). The Continental APD is for an Oil and Gas Well identified as the "Whale 1-25H" well to be drilled with a surface hole located within and upon the NE/4NE/4 of Section 25, a horizontal intercept located within and upon the NE4NE4 of Section 25, with both locations being in Township 28 North, Range 55 East, and a horizontal terminus located within and upon the SE/4SE/4 of Section 12, Township 27 North, Range 55 East, Roosevelt County, Montana. The proposed well is more specifically described within the published notice which is attached to this correspondence as "Exhibit A" and by reference, is incorporated herein.

Phoenix requests a hearing regarding the issuance of the Continental APD for the following reasons that include, but are not limited to:

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**KEARNEY MCWILLIAMS & DAVIS**

January 25, 2026

1. There is no existing temporary spacing unit covering the lands wherein the Continental proposed well will be drilled.
2. Continental submitted an application to create a temporary spacing unit comprised of All of Sections 25 and 36, Township 28 North, Range 55 East, and All of Sections 1 and 12, Township 27 North, Range 55 East, Richland and Roosevelt Counties, Montana. (See Docket No. 198-2026). Continental also submitted an application seeking authorization to drill up to an additional three horizontal Bakken/Three Forks Formation wells anywhere within the temporary spacing unit proposed by Docket No. 198-2026. These matters will be heard at the February 2026 Board hearing.
3. Phoenix submitted an application to create a temporary spacing unit comprised of All of Sections 1, 12, 13, and 24, Township 27 North, Range 55 East, Richland and Roosevelt Counties, Montana. (See Docket No. 134-2026, 23-2026 FED). Phoenix also submitted an application seeking authorization to drill up to an additional three horizontal Bakken/Three Forks Formation wells anywhere within the temporary spacing unit proposed by Docket No. 134-2026, 23-2026 FED. (See Docket No. 135-2026, 24-2026 FED). These matters will be heard at the February 2026 Board hearing.
4. Kraken submitted an application to create a temporary spacing unit comprised of All of Section 25, Township 28 North, Range 55 East, and All of Sections 28, 29, and 30, Township 28 North, Range 56 East, Roosevelt County, Montana. (See Docket No. 310-2025)<sup>1</sup>. Kraken has also submitted an application seeking authorization to drill up to an additional three horizontal Bakken/Three Forks Formation wells anywhere within the temporary spacing unit proposed by Docket No. 310-2025. (See Docket No. 311-2025). These matters will be heard at the February 2026 Board hearing.
5. Kraken submitted an application to create a temporary spacing unit comprised of All of Section 36, Township 28 North, Range 55 East, and All of Sections 31 and 32, Township 28 North, Range 56 East, Roosevelt County, Montana. (See Docket No. 90-2026, 17-2026 FED). Kraken has also submitted an application seeking authorization to drill up to three additional horizontal Bakken/Three Forks Formation wells anywhere within the temporary spacing unit proposed by Docket No. 90-2026, 17-2026 FED. (See Docket No. 91-2026, 18-2026 FED). These matters will also be heard at the February 2026 Board hearing.

---

<sup>1</sup> Phoenix notes that Kraken has requested that operations for drilling of said well must commence within two (2) years of the date of the Order issued by the Board.

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Page 2 of 7

**JAN 26 2026**

**KEARNEY McWILLIAMS & DAVIS**

January 25, 2026

6. Kraken Oil & Gas LLC (“Kraken”) previously submitted an application to create a temporary spacing unit comprised of All of Section 36, Township 28 North, Range 55 East, and All of Sections 31, 32, and 33, Township 28 North, Range 56 East, Roosevelt County, Montana. (See Docket No. 312-2025, 1-2026 FED). Kraken also previously submitted an application to authorize the drilling of up to three additional horizontal Bakken/Three Forks Formation wells anywhere within the temporary spacing unit proposed by Docket No. 312-2025, 1-2026. (See Docket No. 313-2025, 2-2026 FED). Docket Nos. 312-2025 and 313-2025 were denied by the Board pursuant to Board Order No. 321-2025. Kraken has requested a re-hearing regarding these matters.
7. Phoenix has definite capital-backed plans to drill wells within the temporary spacing unit proposed by Docket Nos. 134-2026, 23-2026 FED and 135-2026, 24-2026 FED, described above. Specifically, Phoenix submitted the following Applications for Permit to Drill that cover the above-described lands, to wit (“Phoenix APDs”):
  - a. The proposed “Sphinx” unit APDs were published as follows, to wit:
    - i. “Sphinx 1-12-13-24 1H”, published in the Helena Independent Record on January 24, 2026.
    - ii. “Sphinx 1-12-13-24 2H”, published in the Helena Independent Record on January 24, 2026.
    - iii. “Sphinx 1-12-13-24 3H”, published in the Helena Independent Record on January 24, 2026.
    - iv. “Sphinx 1-12-13-24 4H”, published in the Helena Independent Record on January 24, 2026.
8. Montana is a first to file state, subject to some limited exceptions. Here, the Board has not approved a temporary spacing unit covering any of the lands described above. Accordingly, until the Board approves one of the above-described proposed temporary spacing units, “first to file” is irrelevant as each of Continental and Phoenix have proposed APDs specific to the lands described in their respective applications.
9. Several additional factors confirm Phoenix’s APDs are controlling.
  - a. Phoenix is engaged in planning and investments for the development of the TSU, in anticipation of the Board approving its proposed spacing plan at the February 2026 Hearing.

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**JAN 26 2026**MONTANA BOARD OF OIL &  
GAS CONSERVATION • BILLING**223 - 2026**

**KEARNEY MCWILLIAMS & DAVIS**

January 25, 2026

- b. Continental sent Phoenix an AFE dated October 29, 2025, relating to the Conaway 2-19H well. Continental's estimated costs detailed within the AFE (over 17 million dollars) far exceeded Phoenix's conservative estimates related to development of the unit. If Continental's AFE for this unit is similar to the one Phoenix received for Conaway, approving the Continental APD or the pending APDs that Continental may have acquired from Heritage, would result in economic waste and would be detrimental to Phoenix with regard to developing the area and its own interests. Approving Phoenix's TSU and corresponding APDs will result in a more efficient, cost effective, orderly way to develop the area.
- c. Phoenix will be ready to drill within the next year. Phoenix has 3 rigs and intends to dedicate one of its rigs to drilling and operating in Montana in 2026. Continental does not have a rig in Montana currently. Recent public announcements by Continental indicate that Continental will shut down its drilling activity in the Bakken for the foreseeable future.
- d. Phoenix has engaged in a pattern of fully developing its approved units, which allows for efficient and economic development of the pool, prevents waste, and protects the correlative rights of all interested parties, including but not limited to the mineral owners, working interest owners, tax payers, and the State of Montana in general. Denying the Continental APD will confirm that Phoenix has the ability to develop its TSU in an orderly manner that will promote maximum recovery, protect correlative rights and prevent waste.

Accordingly, Phoenix requests the following relief, to wit:

1. That the Board approve Phoenix's proposed TSU at the February 2026 Hearing, and thereafter approve all four of Phoenix's Spinx APDs that were published on January 24, 2026; and
2. That the Board deny the Continental APD as moot, for the following reasons:
  - a. Phoenix's APDs are filed within an existing approved TSU and in all other respects approvable.
3. If, the Board does not approve Phoenix's proposed TSU at the February 2026 hearing, Phoenix requests that the Continental APD be heard at the April 2026 Board hearing as required per Administrative Rule of Montana § 36.22.601(4)(a);

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Page 4 of 7

**JAN 26 2026**MONTANA BOARD OF OIL &  
GAS CONSERVATION • BILLINGS**223 - 2026**

KEARNEY MCWILLIAMS & DAVIS

January 25, 2026

- 4. That following said hearing, the Board enter an Order denying the Continental APD; and
- 5. For any other relief the Board may deem appropriate.

Sincerely,

KEARNEY, MCWILLIAMS & DAVIS, PLLC



By:

Wendy A. Johnson  
[wjohnson@kmd.law](mailto:wjohnson@kmd.law)  
 Amanda J. Jackson  
[ajackson@kmd.law](mailto:ajackson@kmd.law)  
*Attorneys for Phoenix Operating LLC*

RECEIVED

JAN 26 2026

MONTANA BOARD OF OIL & GAS CONSERVATION • BILLINGS

KEARNEY MCWILLIAMS & DAVIS

January 25, 2026

CERTIFICATE OF SERVICE

I, WENDY A. JOHNSON, hereby certify that on January 25, 2026, I served a true and correct copy of the foregoing Demand for Opportunity to be Heard to the following parties:

By FAX:


Ben Jones  
Administrator/Petroleum Engineer  
State of Montana  
Board of Oil and Gas Conservation  
2535 St. Johns Avenue  
Billings, MT 59102  
FAX: (406) 652-5305

*With a copy sent to Board Administrator, Ben Jones, via electronic mail:*  
E-Mail: [bjones@mt.gov](mailto:bjones@mt.gov)

By CERTIFIED MAIL:

Continental Resources, Inc.  
P.O. Box 269000  
Oklahoma City, Oklahoma 73126

*With a copy sent to Continental's legal counsel, Scotti Gray, via electronic mail:*  
E-Mail: [scotti@graylawmt.com](mailto:scotti@graylawmt.com)

By:   
Wendy A. Johnson

RECEIVED

JAN 26 2026

MONTANA BOARD OF OIL &  
GAS CONSERVATION • BILLINGS

**KEARNEY MCWILLIAMS & DAVIS**

January 25, 2026

**EXHIBIT A**

**Notice of Application**

Published in Helena Independent Record on January 15, 2026

**Location**

Lewis and Clark County, Montana

**Notice Text**

Whale 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: Whale 1-25H

Surface Hole Location: 545'FNL & 414'FEL, NENE Sec 25-28N-55E

Horizontal Intercept: 645'FNL & 710'FEL, NENE Sec 25-28N-55E

Horizontal Terminus: 200 FSL & 660 FEL, SESE Sec 12-27N-55E County: Roosevelt

**Proposed Total Depth:** (1) 30,444 MD, 9,927 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

January 15, 2026 COL-MT-202020 MMAXLP

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**JAN 26 2026**

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

## Breton, Jennifer

---

**From:** wjohnson@kmd.law  
**Sent:** Tuesday, January 27, 2026 10:58 AM  
**To:** Jones, Ben; Breton, Jennifer  
**Cc:** ajackson@kmd.law; skearney@kmd.law; 'Don Lee'; 'Justin Arn'; 'Lindsey Wilson'; scotti@graylawmt.com  
**Subject:** [EXTERNAL] Phoenix - Demand for Opportunity to be Heard re: Continental APDs  
**Attachments:** Phoenix, Demand for Hearing, Continental APDs (Tiger and Nurse).pdf; Phoenix, Demand for Hearing, Continental Lemon APD.pdf

Ben and Jennifer,

Please find attached Phoenix's Demands for Opportunity to be Heard regarding Continental's APDs that were published in the Helena Independent Record on January 17, 2026. Please let me know if you have any questions or need anything additional from me!

Sincerely,

Wendy A. Johnson  
Senior Attorney  
Licensed in Montana and Texas



KEARNEY, MCWILLIAMS & DAVIS, PLLC  
Houston: 55 Waugh #150, Houston, TX 77007  
Denver: 1625 Broadway #2950, Denver, CO 80202  
Dallas - Fort Worth: 1235 South Main #280, Grapevine, TX 76051  
San Antonio: 40 NE Loop 410 #431, San Antonio, TX 78216  
Sheridan: 110 S. Gould, 2<sup>nd</sup> Floor, Sheridan, WY 82801  
Cell: (406) 369-1778

NOTICE: This E-mail (including attachments) is covered by the Electronic Communications Privacy Act, 18 U.S.C. 2510-2521, 2701-2710, is confidential, and may be legally privileged. If you are not the intended recipient, you are hereby notified that any retention, dissemination, distribution, or copying of this communication is strictly prohibited. Please reply to the sender that you have received the message in error, then delete it.

# KEARNEY MCWILLIAMS & DAVIS

## ATTORNEYS AT LAW

**Denver:** 1625 Broadway, Suite 2950, Denver, CO 80202  
**Dallas • Fort Worth:** 1235 South Main #280, Grapevine, TX 76051  
**Houston:** 55 Waugh, Suite 150, Houston, TX 77007  
**San Antonio:** 40 N.E. Loop 410, Suite 431, San Antonio, TX 78216  
**Sheridan:** 110 S. Gould St., 2<sup>nd</sup> Floor, Sheridan, WY 82801

[www.KMD.law](http://www.KMD.law)

**Licenses:** AR CO CT DC ID LA MD MS MT  
ND NE NM NY OK TX UT WY & USPTO  
**Phone:** (888) 855-1276  
**Fax:** (713) 936-9621  
admin@kmd.law

**January 27, 2026**

Attention : Ben Jones, Administrator/Petroleum Engineer

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

Fax # : 406-652-5305

Re: Phoenix Operating LLC - Demand for Opportunity to be Heard concerning Continental Resources, Inc.'s Applications for Permit to Drill (Tiger 1-26H and Nurse 1-27H), Published January 17, 2025.

Dear Mr. Jones,

Pursuant to Administrative Rule of Montana § 36.22.601, Phoenix Operating LLC ("Phoenix"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, hereby demands an opportunity to be heard regarding the Applications for Permit to Drill ("APD") Oil and Gas Wells, published by Continental Resources, Inc. ("Continental") in the Helena Independent Record, on January 17, 2026 (hereinafter referred to as the "Continental APDs"). The Continental APDs are for Oil and Gas Wells identified as the "Tiger 1-26H" and the "Nurse 1-27H" wells to be drilled as follows, to wit:

1. The Tiger 1-26H well is to be drilled with a surface hole location located within and upon the NW/4NW/4 of Section 26, with a horizontal intercept located within and upon the NW/4NW/4 of Section 26, Township 28 North, Range 55 East, and a horizontal terminus located within and upon the SW/4SW/4 of Section 11, Township 27 North, Range 55 East, Roosevelt County, Montana.
2. The Nurse 1-27H well is to be drilled with a surface hole location located within and upon the NW/4NW/4 of Section 26, Township 28 North, Range 55 East, with a horizontal intercept located within and upon the NE/4NE/4 of Section 27, and a

KEARNEY MCWILLIAMS & DAVIS

January 27, 2026

horizontal terminus located within and upon the SE/4SE/4 of Section 10, Township 27 North, Range 55 East, Roosevelt County, Montana.

The proposed wells are more specifically described within the published notices which are attached to this correspondence as "Exhibit A" and by reference, are incorporated herein.

Phoenix requests a hearing regarding the issuance of the Continental APDs for the following reasons that include, but are not limited to:

1. There are no existing temporary spacing units covering the lands wherein the Continental proposed wells will be drilled.
2. With regard to the lands described within the Tiger 1-26H APD, the following applications were submitted, to wit:
  - a. Phoenix submitted an application to create a temporary spacing unit comprised of All of Sections 26 and 35, Township 28 North, Range 55 East, and All of Sections 2 and 11, Township 27 North, Range 55 East, Richland and Roosevelt Counties, Montana. (See Docket No. 132-2026, 21-2026 FED). Phoenix also submitted an application seeking authorization to drill up to an additional three horizontal Bakken/Three Forks Formation wells anywhere within the temporary spacing unit proposed by Docket No. 132-2026, 21-2026 FED. (See Docket No. 133-2026, 22-2026 FED). These matters will be heard at the February 2026 Board hearing.
  - b. Continental submitted an application to create a temporary spacing unit comprised of All of Sections 26 and 35, Township 28 North, Range 55 East, and All of Sections 2 and 11, Township 27 North, Range 55 East, Richland and Roosevelt Counties, Montana. (See Docket No. 196-2026, 41-2026 FED). Continental also submitted an application seeking authorization to drill up to an additional three horizontal Bakken/Three Forks Formation wells anywhere within the temporary spacing unit proposed by Docket No. 196-2026, 41-2026 FED. (See Docket No. 197-2026, 42-2026 FED). These matters will be heard at the February 2026 Board hearing.
3. With regard to the lands described within the Nurse 1-27H APD, the following applications were submitted, to wit:

January 27, 2026

- a. Phoenix submitted an application to create a temporary spacing unit comprised of All of Sections 27 and 34, Township 28 North, Range 55 East, and All of Sections 3 and 10, Township 27 North, Range 55 East, Richland and Roosevelt Counties, Montana. (See Docket No. 160-2026, 29-2026 FED). Phoenix also submitted an application seeking authorization to drill up to an additional three horizontal Bakken/Three Forks Formation wells anywhere within the temporary spacing unit proposed by Docket No. 160-2026, 29-2026 FED. (See Docket No. 161-2026, 30-2026 FED). These matters will be heard at the February 2026 Board hearing.
  - b. Continental submitted an application to create a temporary spacing unit comprised of All of Sections 27 and 34, Township 28 North, Range 55 East, and All of Sections 3 and 10, Township 27 North, Range 55 East, Richland and Roosevelt Counties, Montana. (See Docket No. 194-2026, 39-2026 FED). Continental also submitted an application seeking authorization to drill up to an additional three horizontal Bakken/Three Forks Formation wells anywhere within the temporary spacing unit proposed by Docket No. 194-2026, 39-2026 FED. (See Docket No. 195-2026, 40-2026 FED). These matters will be heard at the February 2026 Board hearing.
4. Phoenix has definite capital-backed plans to drill four (4) wells within each of its proposed temporary spacing units described above.
  5. The Board has not approved a temporary spacing unit covering any of the lands described above. Accordingly, until the Board approves one of the above-described proposed temporary spacing units, “first to file” is irrelevant as each of Phoenix and Continental have proposed APDs specific to the lands described in their respective pending applications. Phoenix’s proposed development plan prevents any lands from being stranded while also allowing for orderly development of the entire area.
  6. Several additional factors confirm Phoenix’s APDs are controlling.
    - a. Phoenix is engaged in planning and investments for the development of both of the above-described TSUs, in anticipation of the Board approving its proposed spacing plans at the February 2026 Hearing.
    - b. Continental sent Phoenix an AFE dated October 29, 2025, relating to the Conaway 2-19H well. Continental’s estimated costs detailed within the AFE

January 27, 2026

(over 17 million dollars) far exceeded Phoenix's conservative estimates related to development of the unit. If Continental's AFE for this unit is similar to the one Phoenix received for Conaway, approving the Continental APD or the pending APDs that Continental may have acquired from Heritage, would result in economic waste and would be detrimental to Phoenix with regard to developing the area and its own interests. Approving Phoenix's TSU and corresponding APDs will result in a more efficient, cost effective, orderly way to develop the area.

- c. Phoenix will be ready to drill within the next year. Phoenix has 3 rigs and intends to dedicate one of its rigs to drilling and operating in Montana in 2026. Continental does not have a rig in Montana currently. Recent public announcements by Continental's company leadership have indicated that Continental is indefinitely halting drilling in the Bakken. See: <https://northdakotamonitor.com/2026/01/20/continental-resources-to-stop-drilling-in-north-dakota-for-now-but-still-pumping-oil/>
- d. Phoenix has engaged in a pattern of fully developing its approved units, which allows for efficient and economic development of the pool, prevents waste, and protects the correlative rights of all interested parties, including but not limited to the mineral owners, working interest owners, tax payers, and the State of Montana in general. Denying the Continental APD will confirm that Phoenix has the ability to develop its TSU in an orderly manner that will promote maximum recovery, protect correlative rights and prevent waste.
- e. The Board has previously approved the permits of one operator filing two permits, over a second operator who only filed one permit, where although filed later, the first operator's two permits were the amount of permits allowed for by the underlying temporary spacing unit to fully drill the unit. (See Order No. 49-2021). In that instance the Board held that the granting the permits to the operator filing the number of permits sufficient to drill out the temporary spacing units protected corrective rights and prevented waste. (See Order No. 49-2021).

Accordingly, Phoenix requests the following relief, to wit:

KEARNEY MCWILLIAMS & DAVIS

January 27, 2026

1. That the Board approve Phoenix's proposed TSUs at the February 2026 Hearing, and thereafter approve Phoenix's anticipated APDs correlating to each established temporary spacing unit; and
2. That the Board deny the Continental APDs for the following reasons:
  - a. Phoenix's APDs will allow for the full development of the TSUs whereas Continental has only submitted plans relating to one well per proposed unit.
  - b. Phoenix's plans will allow for the orderly development of the area while minimizing waste and protecting correlative rights of all interested parties.
3. If, the Board does not approve Phoenix's proposed TSUs at the February 2026 hearing, Phoenix requests that the Continental APDs be heard at the April 2026 Board hearing as required per Administrative Rule of Montana § 36.22.601(4)(a);
4. That following said hearing, the Board enter an Order denying the Continental APDs; and
5. For any other relief the Board may deem appropriate.

Sincerely,

KEARNEY, MCWILLIAMS & DAVIS, PLLC



By:

Wendy A. Johnson  
[wjohnson@kmd.law](mailto:wjohnson@kmd.law)  
Amanda J. Jackson  
[ajackson@kmd.law](mailto:ajackson@kmd.law)  
*Attorneys for Phoenix Operating LLC*

**KEARNEY McWILLIAMS & DAVIS**

January 27, 2026

**CERTIFICATE OF SERVICE**

I, WENDY A. JOHNSON, hereby certify that on January 27, 2026, I served a true and correct copy of the foregoing Demand for Opportunity to be Heard to the following parties:

By FAX:

Ben Jones  
Administrator/Petroleum Engineer  
State of Montana  
Board of Oil and Gas Conservation  
2535 St. Johns Avenue  
Billings, MT 59102  
FAX: (406) 652-5305

*With a copy sent to Board Administrator, Ben Jones, via electronic mail:*


E-Mail: [bjones@mt.gov](mailto:bjones@mt.gov)

By CERTIFIED MAIL:

Continental Resources, Inc.  
P.O. Box 269000  
Oklahoma City, Oklahoma 73126

*With a copy sent to Continental's legal counsel, Scotti Gray, via electronic mail:*

E-Mail: [scotti@graylawmt.com](mailto:scotti@graylawmt.com)

By:   
Wendy A. Johnson

January 27, 2026

**EXHIBIT A**

**Notice of Application**

Published in Helena Independent Record on January 17, 2026

**Location**

Lewis and Clark County, Montana

**Notice Text**

Tiger 1-26H

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:** Tiger 1-26H

Surface Hole Location: 811'FNL & 506'FWL, NWNW Sec 26-28N-55E  
Horizontal Intercept: 811'FNL & 657'FWL, NWNW Sec 26-28N-55E  
Horizontal Terminus: 200 FSL & 660 FWL, SWSW Sec 11-27N-55E  
County: Roosevelt

**Proposed Total Depth:** (1) 30,258 MD; 9,982 TVD

Notice is hereby given that an application for permit to drill an oil and gas well at the surface location set forth above to the depth as stated will be filed with the Montana Board of Oil and Gas Conservation. Pursuant to Rules 36.22.601 and 36.22.604, Administrative Rules of Montana, an interested party may demand an opportunity to be heard by the Montana Board of Oil and Gas Conservation concerning the application. SUCH DEMAND FOR HEARING MUST BE RECEIVED BY THE MONTANA BOARD OF OIL AND GAS CONSERVATION AT THE ADDRESS SET FORTH 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

January 17, 2026 COL-MT-202030 MNAXLP

January 27, 2026

**Notice of Application**

Published in Helena Independent Record on January 17, 2026

**Location**

Lewis and Clark County, Montana

**Notice Text**

Nurse 1-27H

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: Nurse 1-27H**

Surface Hole Location: 785'FNL & 447'FWL, NWNW Sec 26-28N-55E

Horizontal Intercept: 785'FNL & 663'FEL, NENE Sec 27-27N-55E

Horizontal Terminus: 200 FSL & 660 FEL, SESE Sec 10-27N-55E County:  
Roosevelt

**Proposed Total Depth: (1) 30,352 MD; 9,952 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

January 17, 2026 COL-MT-202029 MNAXLP

# KEARNEY MCWILLIAMS & DAVIS

## ATTORNEYS AT LAW

**Denver:** 1625 Broadway, Suite 2950, Denver, CO 80202  
**Dallas • Fort Worth:** 1235 South Main #280, Grapevine, TX 76051  
**Houston:** 55 Waugh, Suite 150, Houston, TX 77007  
**San Antonio:** 40 N.E. Loop 410, Suite 431, San Antonio, TX 78216  
**Sheridan:** 110 S. Gould St., 2<sup>nd</sup> Floor, Sheridan, WY 82801

[www.KMD.law](http://www.KMD.law)

**Licenses:** AR CO CT DC ID LA MD MS MT  
ND NE NM NY OK TX UT WY & USPTO  
**Phone:** (888) 855-1276  
**Fax:** (713) 936-9621  
admin@kmd.law

**January 27, 2026**

Attention : Ben Jones, Administrator/Petroleum Engineer

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

Fax # : 406-652-5305

Re: Phoenix Operating LLC - Demand for Opportunity to be Heard concerning Continental Resources, Inc.'s Applications for Permit to Drill (Tiger 1-26H and Nurse 1-27H), Published January 17, 2025.

Dear Mr. Jones,

Pursuant to Administrative Rule of Montana § 36.22.601, Phoenix Operating LLC ("Phoenix"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, hereby demands an opportunity to be heard regarding the Applications for Permit to Drill ("APD") Oil and Gas Wells, published by Continental Resources, Inc. ("Continental") in the Helena Independent Record, on January 17, 2026 (hereinafter referred to as the "Continental APDs"). The Continental APDs are for Oil and Gas Wells identified as the "Tiger 1-26H" and the "Nurse 1-27H" wells to be drilled as follows, to wit:

1. The Tiger 1-26H well is to be drilled with a surface hole location located within and upon the NW/4NW/4 of Section 26, with a horizontal intercept located within and upon the NW/4NW/4 of Section 26, Township 28 North, Range 55 East, and a horizontal terminus located within and upon the SW/4SW/4 of Section 11, Township 27 North, Range 55 East, Roosevelt County, Montana.
2. The Nurse 1-27H well is to be drilled with a surface hole location located within and upon the NW/4NW/4 of Section 26, Township 28 North, Range 55 East, with a horizontal intercept located within and upon the NE/4NE/4 of Section 27, and a

KEARNEY MCWILLIAMS & DAVIS

January 27, 2026

horizontal terminus located within and upon the SE/4SE/4 of Section 10, Township 27 North, Range 55 East, Roosevelt County, Montana.

The proposed wells are more specifically described within the published notices which are attached to this correspondence as "Exhibit A" and by reference, are incorporated herein.

Phoenix requests a hearing regarding the issuance of the Continental APDs for the following reasons that include, but are not limited to:

1. There are no existing temporary spacing units covering the lands wherein the Continental proposed wells will be drilled.
2. With regard to the lands described within the Tiger 1-26H APD, the following applications were submitted, to wit:
  - a. Phoenix submitted an application to create a temporary spacing unit comprised of All of Sections 26 and 35, Township 28 North, Range 55 East, and All of Sections 2 and 11, Township 27 North, Range 55 East, Richland and Roosevelt Counties, Montana. (See Docket No. 132-2026, 21-2026 FED). Phoenix also submitted an application seeking authorization to drill up to an additional three horizontal Bakken/Three Forks Formation wells anywhere within the temporary spacing unit proposed by Docket No. 132-2026, 21-2026 FED. (See Docket No. 133-2026, 22-2026 FED). These matters will be heard at the February 2026 Board hearing.
  - b. Continental submitted an application to create a temporary spacing unit comprised of All of Sections 26 and 35, Township 28 North, Range 55 East, and All of Sections 2 and 11, Township 27 North, Range 55 East, Richland and Roosevelt Counties, Montana. (See Docket No. 196-2026, 41-2026 FED). Continental also submitted an application seeking authorization to drill up to an additional three horizontal Bakken/Three Forks Formation wells anywhere within the temporary spacing unit proposed by Docket No. 196-2026, 41-2026 FED. (See Docket No. 197-2026, 42-2026 FED). These matters will be heard at the February 2026 Board hearing.
3. With regard to the lands described within the Nurse 1-27H APD, the following applications were submitted, to wit:

KEARNEY MCWILLIAMS & DAVIS

January 27, 2026

- a. Phoenix submitted an application to create a temporary spacing unit comprised of All of Sections 27 and 34, Township 28 North, Range 55 East, and All of Sections 3 and 10, Township 27 North, Range 55 East, Richland and Roosevelt Counties, Montana. (See Docket No. 160-2026, 29-2026 FED). Phoenix also submitted an application seeking authorization to drill up to an additional three horizontal Bakken/Three Forks Formation wells anywhere within the temporary spacing unit proposed by Docket No. 160-2026, 29-2026 FED. (See Docket No. 161-2026, 30-2026 FED). These matters will be heard at the February 2026 Board hearing.
  - b. Continental submitted an application to create a temporary spacing unit comprised of All of Sections 27 and 34, Township 28 North, Range 55 East, and All of Sections 3 and 10, Township 27 North, Range 55 East, Richland and Roosevelt Counties, Montana. (See Docket No. 194-2026, 39-2026 FED). Continental also submitted an application seeking authorization to drill up to an additional three horizontal Bakken/Three Forks Formation wells anywhere within the temporary spacing unit proposed by Docket No. 194-2026, 39-2026 FED. (See Docket No. 195-2026, 40-2026 FED). These matters will be heard at the February 2026 Board hearing.
4. Phoenix has definite capital-backed plans to drill four (4) wells within each of its proposed temporary spacing units described above.
  5. The Board has not approved a temporary spacing unit covering any of the lands described above. Accordingly, until the Board approves one of the above-described proposed temporary spacing units, “first to file” is irrelevant as each of Phoenix and Continental have proposed APDs specific to the lands described in their respective pending applications. Phoenix’s proposed development plan prevents any lands from being stranded while also allowing for orderly development of the entire area.
  6. Several additional factors confirm Phoenix’s APDs are controlling.
    - a. Phoenix is engaged in planning and investments for the development of both of the above-described TSUs, in anticipation of the Board approving its proposed spacing plans at the February 2026 Hearing.
    - b. Continental sent Phoenix an AFE dated October 29, 2025, relating to the Conaway 2-19H well. Continental’s estimated costs detailed within the AFE

January 27, 2026

(over 17 million dollars) far exceeded Phoenix's conservative estimates related to development of the unit. If Continental's AFE for this unit is similar to the one Phoenix received for Conaway, approving the Continental APD or the pending APDs that Continental may have acquired from Heritage, would result in economic waste and would be detrimental to Phoenix with regard to developing the area and its own interests. Approving Phoenix's TSU and corresponding APDs will result in a more efficient, cost effective, orderly way to develop the area.

- c. Phoenix will be ready to drill within the next year. Phoenix has 3 rigs and intends to dedicate one of its rigs to drilling and operating in Montana in 2026. Continental does not have a rig in Montana currently. Recent public announcements by Continental's company leadership have indicated that Continental is indefinitely halting drilling in the Bakken. See: <https://northdakotamonitor.com/2026/01/20/continental-resources-to-stop-drilling-in-north-dakota-for-now-but-still-pumping-oil/>
- d. Phoenix has engaged in a pattern of fully developing its approved units, which allows for efficient and economic development of the pool, prevents waste, and protects the correlative rights of all interested parties, including but not limited to the mineral owners, working interest owners, tax payers, and the State of Montana in general. Denying the Continental APD will confirm that Phoenix has the ability to develop its TSU in an orderly manner that will promote maximum recovery, protect correlative rights and prevent waste.
- e. The Board has previously approved the permits of one operator filing two permits, over a second operator who only filed one permit, where although filed later, the first operator's two permits were the amount of permits allowed for by the underlying temporary spacing unit to fully drill the unit. (See Order No. 49-2021). In that instance the Board held that the granting the permits to the operator filing the number of permits sufficient to drill out the temporary spacing units protected corrective rights and prevented waste. (See Order No. 49-2021).

Accordingly, Phoenix requests the following relief, to wit:

KEARNEY MCWILLIAMS & DAVIS

January 27, 2026

1. That the Board approve Phoenix's proposed TSUs at the February 2026 Hearing, and thereafter approve Phoenix's anticipated APDs correlating to each established temporary spacing unit; and
2. That the Board deny the Continental APDs for the following reasons:
  - a. Phoenix's APDs will allow for the full development of the TSUs whereas Continental has only submitted plans relating to one well per proposed unit.
  - b. Phoenix's plans will allow for the orderly development of the area while minimizing waste and protecting correlative rights of all interested parties.
3. If, the Board does not approve Phoenix's proposed TSUs at the February 2026 hearing, Phoenix requests that the Continental APDs be heard at the April 2026 Board hearing as required per Administrative Rule of Montana § 36.22.601(4)(a);
4. That following said hearing, the Board enter an Order denying the Continental APDs; and
5. For any other relief the Board may deem appropriate.

Sincerely,

KEARNEY, MCWILLIAMS & DAVIS, PLLC



By:

Wendy A. Johnson  
[wjohnson@kmd.law](mailto:wjohnson@kmd.law)  
Amanda J. Jackson  
[ajackson@kmd.law](mailto:ajackson@kmd.law)  
*Attorneys for Phoenix Operating LLC*

KEARNEY McWILLIAMS & DAVIS

January 27, 2026

**CERTIFICATE OF SERVICE**

I, WENDY A. JOHNSON, hereby certify that on January 27, 2026, I served a true and correct copy of the foregoing Demand for Opportunity to be Heard to the following parties:

By FAX:

Ben Jones  
Administrator/Petroleum Engineer  
State of Montana  
Board of Oil and Gas Conservation  
2535 St. Johns Avenue  
Billings, MT 59102  
FAX: (406) 652-5305

*With a copy sent to Board Administrator, Ben Jones, via electronic mail:*


E-Mail: [bjones@mt.gov](mailto:bjones@mt.gov)

By CERTIFIED MAIL:

Continental Resources, Inc.  
P.O. Box 269000  
Oklahoma City, Oklahoma 73126

*With a copy sent to Continental's legal counsel, Scotti Gray, via electronic mail:*

E-Mail: [scotti@graylawmt.com](mailto:scotti@graylawmt.com)

By:   
Wendy A. Johnson

January 27, 2026

**EXHIBIT A**

**Notice of Application**

Published in Helena Independent Record on January 17, 2026

**Location**

Lewis and Clark County, Montana

**Notice Text**

Tiger 1-26H

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:** Tiger 1-26H

Surface Hole Location: 811'FNL & 506'FWL, NWNW Sec 26-28N-55E

Horizontal Intercept: 811'FNL & 657'FWL, NWNW Sec 26-28N-55E

Horizontal Terminus: 200 FSL & 660 FWL, SWSW Sec 11-27N-55E

County: Roosevelt

**Proposed Total Depth:** (1) 30,258 MD; 9,982 TVD

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

Pursuant to Rules 36.22.601 and 36.22.604, Administrative Rules of  
Montana, an interested party may demand an opportunity to be heard  
by the Montana Board of Oil and Gas Conservation concerning the  
application. SUCH DEMAND FOR HEARING MUST BE RECEIVED BY THE  
MONTANA BOARD OF OIL AND GAS CONSERVATION AT THE ADDRESS  
SET FORTH 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

January 17, 2026 COL-MT-202030 MNAXLP

January 27, 2026

**Notice of Application**

Published in Helena Independent Record on January 17, 2026

**Location**

Lewis and Clark County, Montana

**Notice Text**

Nurse 1-27H

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: Nurse 1-27H**

Surface Hole Location: 785'FNL & 447'FWL, NWNW Sec 26-28N-55E

Horizontal Intercept: 785'FNL & 663'FEL, NENE Sec 27-27N-55E

Horizontal Terminus: 200 FSL & 660 FEL, SESE Sec 10-27N-55E County:

Roosevelt

**Proposed Total Depth:** (1) 30,352 MD; 9,952 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

January 17, 2026 COL-MT-202029 MNAXLP

# KEARNEY MCWILLIAMS & DAVIS

## ATTORNEYS AT LAW

**Denver:** 1625 Broadway, Suite 2950, Denver, CO 80202  
**Dallas • Fort Worth:** 1235 South Main #280, Grapevine, TX 76051  
**Houston:** 55 Waugh, Suite 150, Houston, TX 77007  
**San Antonio:** 40 N.E. Loop 410, Suite 431, San Antonio, TX 78216  
**Sheridan:** 110 S. Gould St., 2<sup>nd</sup> Floor, Sheridan, WY 82801

[www.KMD.law](http://www.KMD.law)

**Licenses:** AR CO CT DC ID LA MD MS MT  
ND NE NM NY OK TX UT WY & USPTO  
**Phone:** (888) 855-1276  
**Fax:** (713) 936-9621  
admin@kmd.law

**January 27, 2026**

Attention : Ben Jones, Administrator/Petroleum Engineer

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

Fax # : 406-652-5305

Re: Phoenix Operating LLC - Demand for Opportunity to be Heard concerning Continental Resources, Inc.'s Application for Permit to Drill (Lemon 1-19H), Published January 17, 2025.

Dear Mr. Jones,

Pursuant to Administrative Rule of Montana § 36.22.601, Phoenix Operating LLC ("Phoenix"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, hereby demands an opportunity to be heard regarding the Application for Permit to Drill ("APD") Oil and Gas Wells, published by Continental Resources, Inc. ("Continental") in the Helena Independent Record, on January 17, 2026 (hereinafter referred to as the "Continental APD"). The Continental APD is for an Oil and Gas Well identified as the "Lemon 1-19H" well to be drilled with a surface hole located within and upon the NE/4NE/4 of Section 25, Township 28 North, Range 55 East, with a horizontal intercept located within and upon the SW/4SW/4 of Section 19, and with a horizontal terminus located within and upon the NW/4NW/4 of Section 6, Township 28 North, Range 56 East, Roosevelt County, Montana. The proposed well is more specifically described within the published notice which is attached to this correspondence as "Exhibit A" and by reference, is incorporated herein.

Phoenix requests a hearing regarding the issuance of the Continental APD for the following reasons that include, but are not limited to:

KEARNEY MCWILLIAMS & DAVIS

January 27, 2026

1. Continental established a temporary spacing unit comprised of All of Sections 6, 7, 18, and 19, Township 28 North, Range 56 East, Roosevelt County, Montana, in December 2025. (See Board Order No. 341-2025). Continental was also granted authorization to drill up to an additional three horizontal Bakken/Three Forks Formation wells anywhere within the temporary spacing unit established by Board Order No. 341-2025. (See Board Order No. 342-2025).
2. Continental's APD proposes a single well, which would severely impact the development plans of Phoenix. Phoenix has definite capital-backed plans to drill four horizontal wells within the temporary spacing unit established by Board Order No. 341-2025, and has filed four complete Applications for Permit to Drill a Well, all of which were published on December 30, 2025, in the Helena Independent Record ("Phoenix APDs"), to wit:
  - a. Northman 6-7-18-19 1H
  - b. Northman 6-7-18-19 2H
  - c. Northman 6-7-18-19 3H
  - d. Northman 6-7-18-19 4H

Continental submitted its Demand for Hearing with regard to Phoenix's APDs on January 12, 2026.

3. Montana is a first to file state, subject to some limited exceptions. Accordingly, the Board generally approves fully completed applications in the order they are filed. Phoenix's four APDs were published first on December 30, 2025. The Continental APD was not published until January 17, 2025. Phoenix's four APDs comply with all regulatory requirements and should be upheld by the Board.
4. Several additional factors confirm Phoenix's APDs are controlling.
  - a. Phoenix has more experience drilling and operating four-mile horizontal wells in the Bakken than Continental.
  - b. Phoenix is engaged in planning and investments for the development of the temporary spacing unit.
  - c. Continental indicated in its Demand for Hearing that Continental owns a 13.13% interest in the temporary spacing unit comprised of All of Sections 6,

January 27, 2026

7, 18, and 19, Township 28 North, Range 56 East, Roosevelt County, Montana. Phoenix currently owns approximately 32% of the interest in the existing temporary spacing unit. If the Continental APD is approved, Phoenix will be precluded from developing its own interests in the temporary spacing unit.

- d. Continental sent Phoenix an AFE dated October 29, 2025, relating to the Conaway 2-19H well. Continental's estimated costs detailed within the AFE (over 17 million dollars) far exceeded Phoenix's conservative estimates related to development of the unit. If Continental's AFE for this unit is similar to the one Phoenix received for Conaway, approving the Continental APD, would result in economic waste and would be detrimental to Phoenix with regard to developing the area and its own interests. Approving the Phoenix APDs will result in a more efficient, cost effective, orderly way to develop the area.
- e. Phoenix will be ready to drill within the next year. Phoenix has 3 rigs and intends to dedicate one of its rigs to drilling and operating in Montana in 2026. Continental does not have a rig in Montana currently. Recent public announcements by Continental indicate that Continental will shut down its drilling activity in the Bakken for the foreseeable future.
- f. Phoenix has engaged in a pattern of fully developing its approved units, which allows for efficient and economic development of the pool, prevents waste, and protects the correlative rights of all interested parties, including but not limited to the mineral owners, working interest owners, tax payers, and the State of Montana in general. Denying the Continental APD will confirm that Phoenix has the ability to develop its TSU in an orderly manner that will promote maximum recovery, protect correlative rights and prevent waste.
- g. The Board has previously approved the permits of one operator filing two permits, over a second operator who only filed one permit, where although filed later, the first operator's two permits were the amount of permits allowed for by the underlying temporary spacing unit to fully drill the unit. (See Board Order No. 49-2021). In that instance the Board held that the granting the permits to the operator filing the number of permits sufficient to drill out the temporary spacing units protected corrective rights and prevented waste. *Id.*
- h. Additionally, denying the Continental APD would be in accordance with Board policy and align with its prior decisions.

KEARNEY MCWILLIAMS & DAVIS

January 27, 2026

Accordingly, Phoenix requests the following relief, to wit:

1. That the Board approve the submitted Phoenix APDs as they were filed and published first, and Phoenix's plan will fully develop the established temporary spacing unit.
2. That the Board deny the Continental APDs for the following reasons:
  - a. The Continental APD was published after the Phoenix APDs.
  - b. Phoenix owns more interest in the temporary spacing unit than Continental does.
  - c. Phoenix's four proposed wells will allow for orderly development, prevent waste, and protect the correlative rights of all parties.
3. For any other relief the Board may deem appropriate.

Sincerely,

KEARNEY, MCWILLIAMS & DAVIS, PLLC



By:

Wendy A. Johnson  
[wjohnson@kmd.law](mailto:wjohnson@kmd.law)  
Amanda J. Jackson  
[ajackson@kmd.law](mailto:ajackson@kmd.law)  
*Attorneys for Phoenix Operating LLC*

KEARNEY MCWILLIAMS & DAVIS

January 27, 2026

**CERTIFICATE OF SERVICE**

I, WENDY A. JOHNSON, hereby certify that on January 27, 2026, I served a true and correct copy of the foregoing Demand for Opportunity to be Heard to the following parties:

By FAX:

Ben Jones  
Administrator/Petroleum Engineer  
State of Montana  
Board of Oil and Gas Conservation  
2535 St. Johns Avenue  
Billings, MT 59102  
FAX: (406) 652-5305

*With a copy sent to Board Administrator, Ben Jones, via electronic mail:*


E-Mail: [bjones@mt.gov](mailto:bjones@mt.gov)

By CERTIFIED MAIL:

Continental Resources, Inc.  
P.O. Box 269000  
Oklahoma City, Oklahoma 73126

*With a copy sent to Continental's legal counsel, Scotti Gray, via electronic mail:*

E-Mail: [scotti@graylawmt.com](mailto:scotti@graylawmt.com)

By:   
Wendy A. Johnson

January 27, 2026

**EXHIBIT A**

**Notice of Application**

Published in Helena Independent Record on January 17, 2026

**Location**

Lewis and Clark County, Montana

**Notice Text**

Lemon 1-19H

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 269000

Oklahoma City, Oklahoma 73126

(405) 234-9000 phone/fax

**2. Well Name and Legal Description: Lemon 1-19H**

Surface Hole Location: 545' FNL & 382' FEL, NENE Sec  
25-28N-55E

Horizontal Intercept: 255' FSL & 645' FWL, SWSW Sec  
19-28N-56E

Horizontal Terminus: 200 FNL & 660 FWL, NWNW

Sec 6-28N-56E

County: Roosevelt

**1. Proposed Total Depth: (1) 30,927 MD; 9,737 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

January 17, 2026 COL-MT-202035 **MNAXLP**

# KEARNEY MCWILLIAMS & DAVIS

## ATTORNEYS AT LAW

**Denver:** 1625 Broadway, Suite 2950, Denver, CO 80202  
**Dallas • Fort Worth:** 1235 South Main #280, Grapevine, TX 76051  
**Houston:** 55 Waugh, Suite 150, Houston, TX 77007  
**San Antonio:** 40 N.E. Loop 410, Suite 431, San Antonio, TX 78216  
**Sheridan:** 110 S. Gould St., 2<sup>nd</sup> Floor, Sheridan, WY 82801

[www.KMD.law](http://www.KMD.law)

**Licenses:** AR CO CT DC ID LA MD MS MT  
ND NE NM NY OK TX UT WY & USPTO  
**Phone:** (888) 855-1276  
**Fax:** (713) 936-9621  
admin@kmd.law

**February 24, 2026**

Attention: Ben Jones, Administrator/Petroleum Engineer

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

Fax # : 406-652-5305

Re: Phoenix Operating LLC - Demand for Opportunity to be Heard concerning Black Dog Operating, LLC's Four (4) Applications for Permit to Drill, Published February 14, 2026.

Dear Mr. Jones,

Pursuant to Administrative Rule of Montana § 36.22.601, Phoenix Operating LLC ("Phoenix"), 4643 South Ulster Street, Suite 1510, Denver, Colorado 80237, hereby demands an opportunity to be heard regarding the four (4) Applications for Permit to Drill ("APDs") Oil and Gas Wells, published by Black Dog Operating, LLC ("Black Dog") in the Northern Plains Independent on February 12, 2026, and in the Helena Independent Record, on February 14, 2026 (hereinafter referred to as the "Black Dog APDs"). The Black Dog APDs are for four (4) Oil and Gas Wells to be drilled, within and upon the following locations, to wit:

- 1) Hansen 34-27-22-1H – with a surface location within and upon the SE/4SE/4 of Section 34, Township 29 North, Range 57 East, and a bottom hole location within and upon the NE/4NE/4 of Section 22, Township 29 North Range 57 East, Roosevelt County, Montana;
- 2) Hansen 34-27-22-2H – with a surface location within and upon the SE/4SE/4 of Section 34, Township 29 North, Range 57 East, and a bottom hole location within and upon the NW/4NE/4 of Section 22, Township 29 North Range 57 East, Roosevelt County, Montana;

KEARNEY MCWILLIAMS & DAVIS

February 24, 2026

- 3) Hansen 34-27-22-3H – with a surface location within and upon the SE/4SE/4 of Section 34, Township 29 North, Range 57 East, and a bottom hole location within and upon the NE/4NW/4 of Section 22, Township 29 North, Range 57 East, Roosevelt County, Montana; and
- 4) Hansen 34-27-22-4H – with a surface location within and upon the SE/4SE/4 of Section 34, Township 29 North, Range 57 East, and a bottom hole location within and upon the NW/4NW/4 of Section 22, Township 29 North, Range 57 East, Roosevelt County, Montana.

Each of the proposed wells are more specifically described within the published notices which are attached to this correspondence as “Exhibit A” and by reference are incorporated herein.

Phoenix requests a hearing regarding the issuance of the Black Dog APDs for the following reasons that include, but are not limited to:

1. Black Dog Operating, LLC established a temporary spacing unit comprised of All of Sections 22, 27, and 34, Township 29 North, Range 57 East, Roosevelt County, Montana, at the April 10, 2025, Montana Board of Oil and Gas Conservation (“Board”) hearing. (See Board Order 117-2025). At the same hearing, the Board approved and authorized the drilling of up to three additional horizontal Bakken/Three Forks Formation wells anywhere within the TSU comprised of all of Sections 22, 27, and 34, Township 29 North, Range 57 East, Roosevelt County, Montana. (See Board Order 118-2025).
2. Phoenix was advised by the Board at the October 2025 Hearing that there was no rule preventing Phoenix from submitting permits for wells that may be located in a temporary spacing unit which was established pursuant to another operators application.
3. Prior to submitting the above-described Black Dog APDs, Black Dog did not submit any permits to drill oil and gas wells within the temporary spacing unit established by Board Order 117-2025.
4. Approval of Black Dog’s APDs would severely impact the development plans of Phoenix and would be contrary to Board precedent of approving the first approvable APDs. Phoenix has definite capital-backed plans to drill four horizontal wells and has filed four completed Applications for Permit to Drill a Well (“Phoenix’s APDs”), as follows, to wit:

KEARNEY MCWILLIAMS & DAVIS

February 24, 2026

- a. John Wick 34-27-22 1H – with a surface location within and upon Lot 10, Section 1, Township 28 North, Range 57 East, Roosevelt County, and a bottom hole location within and upon the NW/4NW/4 of Section 22, Township 29 North, Range 57 East, Roosevelt County, Montana;
- b. John Wick 34-27-22 2H – with a surface location within and upon Lot 10, Section 1, Township 28 North, Range 57 East, Roosevelt County, and a bottom hole location within and upon the NE/4NW/4 of Section 22, Township 29 North, Range 57 East, Roosevelt County, Montana;
- c. John Wick 34-27-22 3H – with a surface location within and upon Lot 10, Section 1, Township 28 North, Range 57 East, Roosevelt County, and a bottom hole location within and upon the NW/4NE/4 of Section 22, Township 29 North, Range 57 East, Roosevelt County, Montana; and
- d. John Wick 34-27-22 4H – with a surface location within and upon Lot 10, Section 1, Township 28 North, Range 57 East, Roosevelt County, and a bottom hole location within and upon the NE/4NE/4 of Section 22, Township 29 North, Range 57 East, Roosevelt County, Montana.

The Phoenix APDs were properly noticed by publication in both the Northern Plains Independent and the Helena Independent Record on February 12, 2026. To date, Phoenix is unaware of any Demand for Hearing relating to the Phoenix APDs.

5. Montana is a first to file state, subject to some limited exceptions. Accordingly, the Board generally approves fully completed applications in the order they are filed. Phoenix's APDs were published first on February 12, 2026. The Black Dog APDs were not published in the second publication until February 14, 2026. Phoenix's four APD's comply with all regulatory requirements, and should be upheld by the Board, and administratively approved without a hearing, provided that there is no demand for an opportunity to be heard filed in accordance with the administrative rules.
6. Several additional factors confirm Phoenix's APDs are controlling.
  - a. Phoenix has more experience drilling and operating horizontal wells in the Bakken than Black Dog.
  - b. Phoenix is engaged in planning and investments for the development of the TSU.
  - c. Phoenix owns approximately 41.6% of the working interest within the TSU established by Black Dog pursuant to Board Order 117-2025. If the Black Dog

February 24, 2026

APDs are approved, Phoenix will be precluded from developing its own interests.

- d. Phoenix will be ready to drill within the next year. Phoenix has 3 rigs and intends to dedicate one of its rigs to drilling and operating in Montana in 2026. Phoenix is unaware of Black Dogs ability to drill its proposed wells within the next year.
- e. Phoenix has engaged in a pattern of fully developing its approved units, which allows for efficient and economic development of the pool, prevents waste, and protects the correlative rights of all interested parties, including but not limited to the mineral owners, working interest owners, taxpayers, and the State of Montana in general. Denying the Black Dog APDs will confirm that Phoenix has the ability to develop the area in an orderly manner that will promote maximum recovery, protect correlative rights and prevent waste.
- f. Additionally, as noted above, denying the Black Dog APDs would be in accordance with Board policy and align with its prior decisions.

Accordingly, Phoenix respectfully requests the following relief, to wit:

1. That the Board administratively approve the Phoenix APDs published on February 12, 2026; and
2. That the Board deny the Black Dog APDs as moot, for the following reasons:
  - a. Phoenix filed and published its APDs first;
  - b. There was no demand for opportunity to be heard regarding Phoenix's APDs; and
  - c. Phoenix's APDs are tied to an approved TSU.
3. Alternatively, if an interested party does in fact file a Demand for Opportunity to be Heard regarding the Phoenix APDs, Phoenix respectfully requests the following:
  - a. The Black Dog APDs be referred to the Board for notice and public hearing at the April 2026 Board meeting as required by Administrative Rule of Montana § 36.2.601(4)(a); and
  - b. That following said hearing, the Board enter an Order approving Phoenix's APDs as they were the first approvable APDs, and denying the Black Dog APDs.

**KEARNEY MCWILLIAMS & DAVIS**

February 24, 2026

4. For any other relief the Board may deem appropriate.

Sincerely,

KEARNEY, MCWILLIAMS & DAVIS, PLLC



By:

Wendy A. Johnson

[wjohnson@kmd.law](mailto:wjohnson@kmd.law)

Amanda J. Jackson

[ajackson@kmd.law](mailto:ajackson@kmd.law)

*Attorneys for Phoenix Operating LLC*

February 24, 2026

**CERTIFICATE OF SERVICE**

I, WENDY A. JOHNSON, hereby certify that on February 24, 2025, I served a true and correct copy of the foregoing Demand for Opportunity to be Heard to the following parties:

By FAX:

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

*With a copy sent to Ben Jones via electronic mail:*


E-Mail: [bjones@mt.gov](mailto:bjones@mt.gov)

By CERTIFIED MAIL:

Black Dog Operating, LLC  
6110 Clarkson Ln.  
Houston, TX 77055

*With a copy sent to Black Dog's legal counsel, Darin W. Johnson, via electronic mail:*

E-Mail: [djohnson@johnsonandlebsock.com](mailto:djohnson@johnsonandlebsock.com)

By:   
Wendy A. Johnson

February 24, 2026

**EXHIBIT A**

**Notice of Application**

Published in Helena Independent Record on February 14, 2026

**Location**

Lewis and Clark County, Montana

**Notice Text**

Hansen 34-27-22-1H Public Notification

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

In the Matter of the application of Black Dog 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:

**Black Dog Operating, LLC**

**6110 Clarkson Ln**

**Houston, TX 77055**

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: SE 1/4 SE 1/4, Section 34, T29N, R57E, S35' FSL,  
693' FEL, Roosevelt County**

**Bottom-Hole Location: NE 1/4 NE 1/4, Section 22, T29N, R57E 220'  
FNL, 660' FEL Roosevelt County**

3. Total Depth Proposed to be Drilled: **25,720'**

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) 655-6015

February 14, 2026 COL-MT-202192 **MNAXLP**

February 24, 2026

**Notice of Application**

Published in Helena Independent Record on February 14, 2026

**Location**

Lewis and Clark County, Montana

**Notice Text**

Hansen 34-27-22-2H Public Notification

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

In the Matter of the application of Black Dog 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:

**Black Dog Operating, LLC**

**6110 Clarkson Ln**

**Houston, TX 77055**

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: SE 1/4 SE 1/4, Section 34, T29N, R57E, 535' FSL,  
726' FEL, Roosevelt County**

**Bottom-Hole Location: NW 1/4 NE 1/4, Section 22, T29N, R57E  
220' FNL, 1980' FEL Roosevelt County**

3. Total Depth Proposed to be Drilled: **25,869'**

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) 655-6015

February 14, 2026 COL-MT-202190 **MNAXLP**

February 24, 2026

**Notice of Application**

Published in Helena Independent Record on February 14, 2026

**Location**

Lewis and Clark County, Montana

**Notice Text**

Hansen 34-27-22-3H Public Notification

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

In the Matter of the application of Black Dog 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:

**Black Dog Operating, LLC**  
**6110 Clarkson Ln**  
**Houston, TX 77055**

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: SE 1/4 SE 1/4, Section 34, T29N, R57E, 535' FSL,  
759' FEL, Roosevelt County**

**Bottom-Hole Location: NE 1/4 NW 1/4, Section 22, T29N, R57E  
220' FNL, 1980' FWL Roosevelt County**

3. Total Depth Proposed to be Drilled: **26,216'**

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) 655-6015

February 14, 2026 COL-MT-202189 **MNAXLP**

February 24, 2026

**Notice of Application**

Published in Helena Independent Record on February 14, 2026

**Location**

Lewis and Clark County, Montana

**Notice Text**

Hansen 34-27-22-4H Public Notification

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

In the Matter of the application of Black Dog 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:

**Black Dog Operating, LLC**  
**6110 Clarkson Ln**  
**Houston, TX 77055**

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: SE 1/4 SE 1/4, Section 34, T29N, R57E, 535' FSL,  
792' FEL, Roosevelt County**

**Bottom-Hole Location: NW 1/4 NW 1/4, Section 22, T29N, R57E  
220' FNL, 660' FWL, Roosevelt County**

3. Total Depth Proposed to be Drilled: **26,822'**

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) 655-6015

February 14, 2026 COL-MT-202191 **MNAXLP**

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

IN THE MATTER OF THE APPLICATION OF CONTINENTAL RESOURCES INC. FOR AN ORDER DESIGNATING AN OVERLAPPING TEMPORARY SPACING UNIT COMPRISED OF ALL OF SECTIONS 4, 9, 16, AND 21, TOWNSHIP 26 NORTH, RANGE 55 EAST, RICHLAND COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT ANY LOCATION NOT CLOSER THAN 200 FEET FROM HEEL/TOE BOUNDARY AND 500 FEET FROM THE SIDE BOUNDARIES OF SAID TEMPORARY SPACING UNIT.

MBOGC Docket No.

205-2026

APPLICATION

APPLICANT FURTHER REQUESTS THAT BOARD ORDER 436-2005 ESTABLISHING A TSU COMPRISED OF SECTIONS 4 AND 9, TOWNSHIP 26 NORTH, RANGE 55 EAST BE VACATED AND THAT BOARD ORDER 118-2013 ESTABLISHING A PSU COMPRISED OF SECTIONS 21 AND 26, TOWNSHIP 26 NORTH, RANGE 55 EAST BE AMENDED TO CLARIFY THAT SAID SPACING UNIT IS LIMITED TO OIL AND ASSOCIATED NATURAL GAS PRODUCED FROM THE BAKKEN/THREE FORKS FORMATION FROM THE CARA 1-21H WELL

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

**[A] Presents the following application:**

1. Applicant is an interest owner and operator within Sections 4, 9, 16 and 21, Township 26 North, Range 55 East, Richland County, Montana, which tracts are presently spaced with respect to the Bakken/Three Forks Formation by Order:
  - 436-2005 – creating a temporary spacing unit comprised of All of Sections 4 and 9, T26N, R55E.
  - 118-2013 – creating a permanent spacing unit comprised of All of Sections 16 and 21, T26N, R55E for oil and gas production from the Cara 1-21H well.

Continental Resources, Inc. operates the Cara 1-21H well within the PSU.

2. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill a horizontal Bakken/Three Forks formation well within, but not closer than 200 feet to the heel/toe exterior boundaries and 500 feet to the lateral boundaries, of a temporary spacing unit (“TSU”) comprised of Sections 4, 9, 16 and 21, Township 26 North, Range 55 East, Richland County, Montana, subject to the condition that the temporary spacing unit be limited to production from the proposed horizontal well.
3. Applicant will, within 90 days of successful completion of the proposed horizontal operation, file an application for the Board’s consideration of permanent spacing and other matters relation to production from the well.
4. The proposed temporary spacing unit contains the following Federal minerals:

Township 26 North, Range 55 East

Section 4: E2SW

Section 9: NWNE, NENW

Section 21: E2NE, NWNE

**[B]      Requests:**

1.      This matter be set for hearing and placed on the Docket, with notice given as required by law.
2.      After hearing the matter, the Montana Board of Oil & Gas Conservation enter its order
  - (i)      Delineating an OTSU comprised of Sections 4, 9, 16 and 21, Township 26 North, Range 55 East, Richland County, Montana, subject to the conditions that the overlapping temporary spacing unit shall be limited to production from the proposed horizontal well, and that within 90 days of successful completion of the proposed horizontal operation, Applicant file an application for Board consideration of permanent spacing and all other matters relating to production of said well.
  - (ii)      Authorizing the Applicant to locate its proposed horizontal well anywhere within such OTSU but not closer than 200 feet to the toe/heel boundaries and no further than 500 feet from the side boundaries thereof and further providing that the 500' lateral setback authorization is only valid from one year of the date of the order. If no well is drilled and the 500' lateral setback is not renewed prior to the expiration of one year, the lateral setback for the first well in this unit shall be 1320' from the side boundaries.
  - (iii)      Vacating Order 436-2005 and amending Order 118-2013 to clarify that said spacing unit is limited to oil and natural gas production from the Bakken/Three Forks Formation from the Cara 1-21H well.
  - (iv)      Any other relief that the Board may deem necessary and appropriate.

Dated March 3, 2026.

CONTINENTAL RESOURCES INC.

By Scotti Gray  
Scotti Gray  
Attorney for Applicant

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

IN THE MATTER OF THE APPLICATION  
OF CONTINENTAL RESOURCES INC.  
FOR AUTHORIZATION TO DRILL UP TO  
THREE ADDITIONAL HORIZONTAL  
BAKKEN/THREE FORKS FORMATION  
WELLS IN THE SPACING UNIT  
COMPRISED OF ALL OF SECTIONS 4, 9  
16, AND 21 TOWNSHIP 26 NORTH,  
RANGE 55 EAST RICHLAND COUNTY,  
MONTANA, AT ANY LOCATION NOT  
CLOSER THAN 500 FEET TO THE SIDE  
BOUNDARIES AND 200 FEET TO THE  
TOE/HEEL BOUNDARIES OF SAID  
SPACING UNIT

MBOGC Docket No.

APPLICATION

266-2026

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

**[A] Presents the following application:**

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

Township 26 North, Range 55 East

Section 5: E2NE, N2NW  
Section 8: N2, N2S2, SESE  
Section 17: E2NE

**[B] Requests:**

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

March 2, 2026.

CONTINENTAL RESOURCES INC.

By Scotti Gray  
Scotti Gray  
Attorney for Applicant

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

IN THE MATTER OF THE APPLICATION OF CONTINENTAL RESOURCES INC. FOR AN ORDER DESIGNATING AN OVERLAPPING TEMPORARY SPACING UNIT COMPRISED OF ALL OF SECTIONS 5, 8, 17 AND 20, TOWNSHIP 26 NORTH, RANGE 55 EAST, RICHLAND COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT ANY LOCATION NOT CLOSER THAN 200 FEET FROM HEEL/TOE BOUNDARY AND 500 FEET FROM THE SIDE BOUNDARIES OF SAID TEMPORARY SPACING UNIT.

MBOGC Docket No. 247-2026
APPLICATION

APPLICANT FURTHER REQUESTS THAT BOARD ORDER 356-2011 ESTABLISHING A TSU COMPRISED OF SECTIONS 5 AND 8, TOWNSHIP 26 NORTH, RANGE 55 EAST BE VACATED AND THAT BOARD ORDER 469-2012 POOLING SECTIONS 17 AND 20, TOWNSHIP 26 NORTH, RANGE 55 EAST BE AMENDED TO CLARIFY THAT SAID ORDER IS LIMITED TO OIL AND ASSOCIATED NATURAL GAS PRODUCED FROM THE BAKKEN/THREE FORKS FORMATION FROM THE WAGNER 1-17H WELL. APPLICANT FURTHER REQUESTS THAT ORDER 470-2012 AUTHORIZING INCREASED DENSITY BE VACATED.

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

**[A] Presents the following application:**

1. Applicant is an interest owner and operator within Sections 5, 8, 17 and 20, Township 26 North, Range 55 East, Richland County, Montana, which tracts are presently spaced with respect to the Bakken/Three Forks Formation by Order:
  - 356-2011 – creating a temporary spacing unit comprised of All of Sections 5 and 8, T26N, R55E.
  - 468-2012 – creating a permanent spacing unit comprised of All of Sections 17 and 20, T26N, R55E for oil and gas production from the Wagner 1-17H well.
    - 470-2012 authorizing 3 additional wells in the Wagner 1-17H unit.

Continental Resources, Inc. operates the Wagner 1-17H well within the PSU.

2. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill a horizontal Bakken/Three Forks formation well within, but not closer than 200 feet to the heel/toe exterior boundaries and 500 feet to the lateral boundaries, of a temporary spacing unit (“TSU”) comprised of Sections 5, 8, 17 and 20, Township 26 North, Range 55 East, Richland County, Montana, subject to the condition that the temporary spacing unit be limited to production from the proposed horizontal well.
3. Applicant will, within 90 days of successful completion of the proposed horizontal operation, file an application for the Board’s consideration of permanent spacing and other matters relation to production from the well.
4. The proposed temporary spacing unit contains the following Federal minerals:

Township 26 North, Range 55 East  
Section 5: E2NE, N2NW  
Section 8: N2, N2S2, SESE  
Section 17: E2NE

[B] **Requests:**

1. This matter be set for hearing and placed on the Docket, with notice given as required by law.
2. After hearing the matter, the Montana Board of Oil & Gas Conservation enter its order:
  - (i) Delineating an OTSU comprised of Sections 5, 8, 17 and 20, Township 26 North, Range 55 East, Richland County, Montana, subject to the conditions that the overlapping temporary spacing unit shall be limited to production from the proposed horizontal well, and that within 90 days of successful completion of the proposed horizontal operation, Applicant file an application for Board consideration of permanent spacing and all other matters relating to production of said well.
  - (ii) Authorizing the Applicant to locate its proposed horizontal well anywhere within such OTSU but not closer than 200 feet to the toe/heel boundaries and no further than 500 feet from the side boundaries thereof and further providing that the 500' lateral setback authorization is only valid from one year of the date of the order. If no well is drilled and the 500' lateral setback is not renewed prior to the expiration of one year, the lateral setback for the first well in this unit shall be 1320' from the side boundaries.
  - (iii) Vacating Orders 356-2011 and 470-2012. Amending Order 469-2012 to clarify that said order is limited to oil and natural gas production from the Bakken/Three Forks Formation from the Wagner 1-17H well.
  - (iv) Any other relief that the Board may deem necessary and appropriate.

Dated March 3, 2026.

CONTINENTAL RESOURCES INC.

By Scotti Gray  
Scotti Gray  
Attorney for Applicant

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

IN THE MATTER OF THE APPLICATION  
OF CONTINENTAL RESOURCES INC.  
FOR AUTHORIZATION TO DRILL UP TO  
THREE ADDITIONAL HORIZONTAL  
BAKKEN/THREE FORKS FORMATION  
WELLS IN THE SPACING UNIT  
COMPRISED OF ALL OF SECTIONS 5, 8,  
17, AND 20 TOWNSHIP 26 NORTH,  
RANGE 55 EAST RICHLAND COUNTY,  
MONTANA, AT ANY LOCATION NOT  
CLOSER THAN 500 FEET TO THE SIDE  
BOUNDARIES AND 200 FEET TO THE  
TOE/HEEL BOUNDARIES OF SAID  
SPACING UNIT

MBOGC Docket No.

269-2026

APPLICATION

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

**[A] Presents the following application:**

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

Township 26 North, Range 55 East

Section 5: E2NE, N2NW

Section 8: N2, N2S2, SESE

Section 17: E2NE

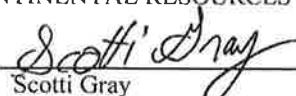
**[B] Requests:**

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

March 2, 2026.

CONTINENTAL RESOURCES INC.

By



Scotti Gray

Attorney for Applicant

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

IN THE MATTER OF THE APPLICATION OF CONTINENTAL RESOURCES INC. FOR AN ORDER DESIGNATING AN OVERLAPPING TEMPORARY SPACING UNIT COMPRISED OF ALL OF SECTIONS 6, 7, 18, AND 19, TOWNSHIP 26 NORTH, RANGE 55 EAST, RICHLAND COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT ANY LOCATION NOT CLOSER THAN 200 FEET FROM HEEL/TOE BOUNDARY AND 500 FEET FROM THE SIDE BOUNDARIES OF SAID TEMPORARY SPACING UNIT.

MBOGC Docket No.

269-2026

APPLICATION

APPLICANT FURTHER REQUESTS THAT BOARD ORDER 113-2006 ESTABLISHING A SPACING UNIT COMPRISED OF SECTIONS 6 AND 7, TOWNSHIP 26 NORTH, RANGE 55 EAST BE VACATED AND THAT BOARD ORDER 128-2012 POOLING SECTIONS 18 AND 19, TOWNSHIP 26 NORTH, RANGE 55 EAST BE AMENDED TO CLARIFY THAT SAID ORDER IS LIMITED TO OIL AND ASSOCIATED NATURAL GAS PRODUCED FROM THE BAKKEN/THREE FORKS FORMATION FROM THE PETERSON 1-18H WELL. APPLICANT FURTHER REQUESTS THAT ORDER 137-2012 AUTHORIZING 3 ADDITIONAL WELLS IN THE SPACING UNIT COMPRISED OF 18 AND 19, T26N, R55E BE VACATED.

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

**[A] Presents the following application:**

1. Applicant is an interest owner and operator within Sections 6, 7, 18 and 19, Township 26 North, Range 55 East, Richland County, Montana, which tracts are presently spaced with respect to the Bakken/Three Forks Formation by Orders:
  - 113-2006 – creating a temporary spacing unit comprised of All of Sections 6 and 7, T26N, R55E.
  - 122-2012 – creating a permanent spacing unit comprised of All of Sections 16 and 21, T26N, R55E for oil and gas production from the Peterson 1-18H well
    - Order 137-2012 authorizing up to three additional wells in the Peterson 1-18H unit.

Continental Resources, Inc. operates the Peterson 1-18H well within the PSU.

2. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill a horizontal Bakken/Three Forks formation well within, but not closer than 200 feet to the heel/toe exterior boundaries and 500 feet to the lateral boundaries, of a temporary spacing unit (“TSU”) comprised of Sections 6, 7, 18 and 19, Township 26 North, Range 55 East, Richland County, Montana, subject to the condition that the temporary spacing unit be limited to production from the proposed horizontal well.
3. Applicant will, within 90 days of successful completion of the proposed horizontal operation, file an application for the Board’s consideration of permanent spacing and other matters relation to production from the well.
4. The proposed temporary spacing unit contains the following Federal minerals:

Township 26 North, Range 55 East  
Section 6: S2NE

**[B]     Requests:**

1.     This matter be set for hearing and placed on the Docket, with notice given as required by law.
2.     After hearing the matter, the Montana Board of Oil & Gas Conservation enter its order:
  - (i)     Delineating an OTSU comprised of Sections 6, 7, 18 and 19, Township 26 North, Range 55 East, Richland County, Montana, subject to the conditions that the overlapping temporary spacing unit shall be limited to production from the proposed horizontal well, and that within 90 days of successful completion of the proposed horizontal operation, Applicant file an application for Board consideration of permanent spacing and all other matters relating to production of said well;
  - (ii)    Authorizing the Applicant to locate its proposed horizontal well anywhere within such OTSU but not closer than 200 feet to the toe/heel boundaries and no further than 500 feet from the side boundaries thereof and further providing that the 500' lateral setback authorization is only valid from one year of the date of the order. If no well is drilled and the 500' lateral setback is not renewed prior to the expiration of one year, the lateral setback for the first well in this unit shall be 1320' from the side boundaries.
  - (iii)   Vacating Orders 113-2006 and 137-2012. Amending Order 128-2012 to clarify that said order is limited to oil and natural gas production from the Bakken/Three Forks Formation from the Peterson 1-18H well.
  - (iv)    Any other relief that the Board may deem necessary and appropriate.

Dated March 4, 2026.

CONTINENTAL RESOURCES INC.

By Scotti Gray  
Scotti Gray  
Attorney for Applicant

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

IN THE MATTER OF THE APPLICATION  
OF CONTINENTAL RESOURCES INC.  
FOR AUTHORIZATION TO DRILL UP TO  
THREE ADDITIONAL HORIZONTAL  
BAKKEN/THREE FORKS FORMATION  
WELLS IN THE SPACING UNIT  
COMPRISED OF ALL OF SECTIONS 6, 7,  
18, AND 19, TOWNSHIP 26 NORTH,  
RANGE 55 EAST, RICHLAND COUNTY,  
MONTANA, AT ANY LOCATION NOT  
CLOSER THAN 500 FEET TO THE SIDE  
BOUNDARIES AND 200 FEET TO THE  
TOE/HEEL BOUNDARIES OF SAID  
SPACING UNIT

MBOGC Docket No.

270-2026

APPLICATION

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

**[A] Presents the following application:**

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

Township 26 North, Range 55 East  
Section 6: S2NE

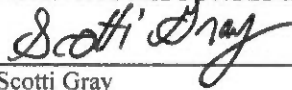
**[B] Requests:**

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

March 3, 2026.

CONTINENTAL RESOURCES INC.

By



Scotti Gray  
Attorney for Applicant

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

IN THE MATTER OF THE APPLICATION OF CONTINENTAL RESOURCES INC. FOR AN ORDER DESIGNATING AN OVERLAPPING TEMPORARY SPACING UNIT COMPRISED OF ALL OF SECTIONS 26 AND 35 TOWNSHIP 26 NORTH, RANGE 55 EAST AND ALL OF SECTIONS 2 AND 11, TOWNSHIP 25 NORTH, RANGE 55 EAST, RICHLAND COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT ANY LOCATION NOT CLOSER THAN 200 FEET FROM HEEL/TOE BOUNDARY AND 500 FEET FROM THE SIDE BOUNDARIES OF SAID TEMPORARY SPACING UNIT.

MBOGC Docket No.

271-2026

APPLICATION

APPLICANT FURTHER REQUESTS THAT BOARD ORDER 436-2011 POOLING SECTIONS 2 AND 11, T25N, R55E, BE AMENDED TO CLARIFY THAT SAID ORDER IS LIMITED TO OIL AND ASSOCIATED NATURAL GAS PRODUCED FROM THE BAKKEN/THREE FORKS FORMATION FROM THE COCHRANE 1-11H WELL AND THAT ORDER 130-2012 AUTHORIZING 3 ADDITIONAL WELLS IN SAID UNIT BE VACATED

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

**[A] Presents the following application:**

1. Applicant is an interest owner and operator within Sections 26 and 35, Township 26 North, Range 55 East, and Sections 2 and 11, Township 25 North, Range 55 East, Richland County, Montana, which tracts are presently spaced with respect to the Bakken/Three Forks Formation by Order:
  - 435-2012 – creating a permanent spacing unit comprised of All of Sections 2 and 11, T25N, R55E for oil and gas production from the Cochrane 1-11H well.
    - 130-2012 – authorizing 3 additional wells in the Cochrane 1-11H unit.

Continental Resources, Inc. operates the Cochrane 1-11H well within the PSU.

2. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill a horizontal Bakken/Three Forks formation well within, but not closer than 200 feet to the heel/toe exterior boundaries and 500 feet to the lateral boundaries, of a temporary spacing unit (“TSU”) comprised of 26 and 35, Township 26 North, Range 55 East, and Sections 2 and 11, Township 25 North, Range 55 East, Richland County, Montana, subject to the condition that the temporary spacing unit be limited to production from the proposed horizontal well.
3. Applicant will, within 90 days of successful completion of the proposed horizontal operation, file an application for the Board’s consideration of permanent spacing and other matters relation to production from the well.

**[B] Requests:**

1. This matter be set for hearing and placed on the Docket, with notice given as required by law.
2. After hearing the matter, the Montana Board of Oil & Gas Conservation enter its order:
  - (i) Delineating an OTSU comprised of 26 and 35, Township 26 North, Range 55 East, and Sections 2 and 11, Township 25 North, Range 55 East, Richland County, Montana, subject to the conditions that the overlapping temporary spacing unit shall be limited to production

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

- (ii) Authorizing the Applicant to locate its proposed horizontal well anywhere within such OTSU but not closer than 200 feet to the toe/heel boundaries and no further than 500 feet from the side boundaries thereof and further providing that the 500' lateral setback authorization is only valid from one year of the date of the order. If no well is drilled and the 500' lateral setback is not renewed prior to the expiration of one year, the lateral setback for the first well in this unit shall be 1320' from the side boundaries.
- (iii) Vacating Order 130-2012 and amending Order 436-2011 to clarify that said Order is limited to oil and natural gas production from the Bakken/Three Forks Formation from the Cochrane 1-11H well.
- (iv) Any other relief that the Board may deem necessary and appropriate.

Dated March 3, 2026.

CONTINENTAL RESOURCES INC.

By Scotti Gray  
Scotti Gray  
Attorney for Applicant

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

IN THE MATTER OF THE APPLICATION  
OF CONTINENTAL RESOURCES INC.  
FOR AUTHORIZATION TO DRILL UP TO  
THREE ADDITIONAL HORIZONTAL  
BAKKEN/THREE FORKS FORMATION  
WELLS IN THE SPACING UNIT  
COMPRISED OF ALL OF SECTIONS 26  
AND 35 TOWNSHIP 26 NORTH, RANGE  
55 EAST AND ALL OF SECTIONS 2 AND  
11, TOWNSHIP 25 NORTH, RANGE 55  
EAST, RICHLAND COUNTY,  
MONTANA, AT ANY LOCATION NOT  
CLOSER THAN 500 FEET TO THE SIDE  
BOUNDARIES AND 200 FEET TO THE  
TOE/HEEL BOUNDARIES OF SAID  
SPACING UNIT

MBOGC Docket No.

272-2026

APPLICATION

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

**[A] Presents the following application:**

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

**[B] Requests:**

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

March 3, 2026.

CONTINENTAL RESOURCES INC.

By Scotti Gray  
Scotti Gray  
Attorney for Applicant

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

IN THE MATTER OF THE APPLICATION OF CONTINENTAL RESOURCES INC. FOR AN ORDER DESIGNATING AN OVERLAPPING TEMPORARY SPACING UNIT COMPRISED OF ALL OF SECTIONS 27 AND 34 TOWNSHIP 26 NORTH, RANGE 55 EAST AND ALL OF SECTIONS 3 AND 10, TOWNSHIP 25 NORTH, RANGE 55 EAST, RICHLAND COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT ANY LOCATION NOT CLOSER THAN 200 FEET FROM HEEL/TOE BOUNDARY AND 500 FEET FROM THE SIDE BOUNDARIES OF SAID TEMPORARY SPACING UNIT.

MBOGC Docket No.

273-2026

APPLICATION

APPLICANT FURTHER REQUESTS THAT BOARD ORDER 346-2012 POOLING SECTIONS 34, T26N, R55E AND SECTION 3, T25N, R55E BE AMENDED TO CLARIFY THAT SAID ORDER IS LIMITED TO OIL AND ASSOCIATED NATURAL GAS PRODUCED FROM THE BAKKEN/THREE FORKS FORMATION FROM THE SHARON 1-3H WELL AND THAT ORDER 345-2012 AUTHORIZING 3 ADDITIONAL WELLS IN SAID UNIT BE VACATED

APPLICANT FUTHER REQUEST THAT ORDER 124-2006 ESTABLISHING A PSU COMPRISED OF SECTIONS 10 AND 15, T25N, R55E BE AMENDED TO CLARIFY THAT SAID SPACING UNIT IS LIMITED TO OIL AND ASSOCIATED NATURAL GAS PRODUCED FROM THE BAKKEN/THREE FORKS FORMATION FROM THE KATHERINE 1-15H WELL AND KATHERINE 2-15H WELL AND THAT ORDER 429-2011 BE AMENDED TO REQUEST UP TO TWO ADDITIONAL WELLS IN THE SPACING UNIT

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

**[A] Presents the following application:**

1. Applicant is an interest owner and operator within Sections 27 and 34, Township 26 North, Range 55 East, and Sections 3 and 10, Township 25 North, Range 55 East, Richland County, Montana, which tracts are presently spaced with respect to the Bakken/Three Forks Formation by Order:
  - 344-2012 – creating a permanent spacing unit comprised of All of Section 3, T25N, R55E and All of Section 34, T26N, R55E for oil and gas production from the Sharon 1-3H well.
    - 345-2012 authorized up to 3 additional wells in the Sharon 1-3H unit.
    - 346-2012 pooled the interest in the Sharon 1-3H unit.
  - 124-2005 – creating a permanent spacing unit comprised of All of Sections 10 and 15, T26N, R55E for oil and gas production from the Katherine 1-15H and Katherine 2-15H wells.
    - 130-2006 – authorizing an additional dual horizontal lateral in the Katherine 1-15H and Katherine 2-15H unit.
    - 429-2011 – amending Order 130-2006 to authorize up to 4 additional wells and amending setbacks in the unit.

Continental Resources, Inc. operates the Sharon 1-3H, Katherine 1-15H and the Katherine 2-15H wells within the PSUs.

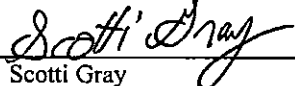
2. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill a horizontal Bakken/Three Forks formation well within, but not closer than 200 feet to the heel/toe exterior boundaries and 500 feet to the lateral boundaries, of a temporary spacing unit ("TSU") comprised of Sections 27 and 34, Township 26 North, Range 55 East, and Sections 3 and 10, Township 25 North, Range 55 East, Richland County, Montana, subject to the condition that the temporary spacing unit be limited to production from the proposed horizontal well.
3. Applicant will, within 90 days of successful completion of the proposed horizontal operation, file an application for the Board's consideration of permanent spacing and other matters relation to production from the well.

**[B] Requests:**

1. This matter be set for hearing and placed on the Docket, with notice given as required by law.
2. After hearing the matter, the Montana Board of Oil & Gas Conservation enter its order:
  - (i) Delineating an OTSU comprised of Sections 27 and 34, Township 26 North, Range 55 East, and Sections 3 and 10, Township 25 North, Range 55 East, Richland County, Montana, subject to the conditions that the overlapping temporary spacing unit shall be limited to production from the proposed horizontal well, and that within 90 days of successful completion of the proposed horizontal operation, Applicant file an application for Board consideration of permanent spacing and all other matters relating to production of said well.
  - (ii) Authorizing the Applicant to locate its proposed horizontal well anywhere within such OTSU but not closer than 200 feet to the toe/heel boundaries and no further than 500 feet from the side boundaries thereof and further providing that the 500' lateral setback authorization is only valid from one year of the date of the order. If no well is drilled and the 500' lateral setback is not renewed prior to the expiration of one year, the lateral setback for the first well in this unit shall be 1320' from the side boundaries.
  - (iii) Amending Order 346-2012 to clarify that said spacing unit is limited to oil and natural gas production from the Sharon 1-3H well and vacating Order 345-2012. Amending Order 124-2006 to clarify that said spacing unit is limited to oil and natural gas production from the Bakken/Three Forks Formation from the Katherine 1-15H and Katherine 2-15H wells and amending Board Order 429-2011 to authorize up to two additional wells in the spacing unit.
  - (iv) Any other relief that the Board may deem necessary and appropriate.

Dated March 3, 2026.

CONTINENTAL RESOURCES INC.

By   
Scotti Gray  
Attorney for Applicant

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

IN THE MATTER OF THE APPLICATION  
OF CONTINENTAL RESOURCES INC.  
FOR AUTHORIZATION TO DRILL UP TO  
THREE ADDITIONAL HORIZONTAL  
BAKKEN/THREE FORKS FORMATION  
WELLS IN THE SPACING UNIT  
COMPRISED OF ALL OF SECTIONS 27  
AND 34 TOWNSHIP 26 NORTH, RANGE  
55 EAST AND ALL OF SECTIONS 3 AND  
10, TOWNSHIP 25 NORTH, RANGE 55  
EAST, RICHLAND COUNTY,  
MONTANA, AT ANY LOCATION NOT  
CLOSER THAN 500 FEET TO THE SIDE  
BOUNDARIES AND 200 FEET TO THE  
TOE/HEEL BOUNDARIES OF SAID  
SPACING UNIT

MBOGC Docket No.

274-2026

APPLICATION

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

**[A] Presents the following application:**

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

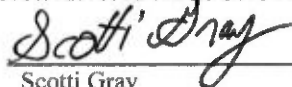
**[B] Requests:**

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

March 3, 2026.

CONTINENTAL RESOURCES INC.

By



Scotti Gray

Attorney for Applicant

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

IN THE MATTER OF THE APPLICATION OF CONTINENTAL RESOURCES INC. FOR AN ORDER DESIGNATING AN OVERLAPPING TEMPORARY SPACING UNIT COMPRISED OF ALL OF SECTIONS 22, 23 AND 24 TOWNSHIP 25 NORTH, RANGE 56 EAST, RICHLAND COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT ANY LOCATION NOT CLOSER THAN 200 FEET FROM HEEL/TOE BOUNDARY AND 500 FEET FROM THE SIDE BOUNDARIES OF SAID TEMPORARY SPACING UNIT.

MBOGC Docket No.

275-2026

APPLICATION

APPLICANT FURTHER REQUESTS THAT BOARD ORDER 552-2012 POOLING SECTIONS 24 AND 25, T25N, R56E BE AMENDED TO CLARIFY THAT SAID ORDER IS LIMITED TO OIL AND ASSOCIATED NATURAL GAS PRODUCED FROM THE BAKKEN/THREE FORKS FORMATION FROM THE LONE BUTTE PATRICIA #24-25 WELL AND THAT ORDER 553-2012 AUTHORIZING 3 ADDITIONAL WELLS IN THAT SAME SPACING UNIT BE VACATED

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

**[A] Presents the following application:**

1. Applicant is an interest owner and operator within Sections 22, 23, 24, Township 25 North, Range 56 East, Richland County, Montana, which tracts are presently spaced with respect to the Bakken/Three Forks Formation by Order:
  - 551-2012 – creating a permanent spacing unit comprised of All of Sections 24 and 25, T25N, R56E for oil and gas production from the Lone Butte Patricia #24-25 1H well.
    - o 553-2012 authorizing 3 additional wells in the Lone Butte Patricia #24-25 1H unit.

Whiting Oil and Gas Corporation operates the Lone Butte Patricia #24-25 1H well within the PSU. Continental has obtained, or will obtain, Whiting Oil and Gas Corporation's written consent for this OTSU application prior to the hearing on this matter.

2. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill a horizontal Bakken/Three Forks formation well within, but not closer than 200 feet to the heel/toe exterior boundaries and 500 feet to the lateral boundaries, of a temporary spacing unit ("TSU") comprised of Sections 22, 23, 24, Township 25 North, Range 56 East, Richland County, Montana, subject to the condition that the temporary spacing unit be limited to production from the proposed horizontal well.
3. Applicant will, within 90 days of successful completion of the proposed horizontal operation, file an application for the Board's consideration of permanent spacing and other matters relation to production from the well.
4. The proposed spacing unit contains the following Federal minerals:

Township 25 North, Range 56 East  
Section 22: S2SW

**[B]     Requests:**

1.     This matter be set for hearing and placed on the Docket, with notice given as required by law.
2.     After hearing the matter, the Montana Board of Oil & Gas Conservation enter its order:
  - (i)     Delineating an OTSU comprised of Sections 22, 23, 24, Township 25 North, Range 56 East, Richland County, Montana, subject to the conditions that the overlapping temporary spacing unit shall be limited to production from the proposed horizontal well, and that within 90 days of successful completion of the proposed horizontal operation, Applicant file an application for Board consideration of permanent spacing and all other matters relating to production of said well;
  - (ii)    Authorizing the Applicant to locate its proposed horizontal well anywhere within such OTSU but not closer than 200 feet to the toe/heel boundaries and no further than 500 feet from the side boundaries thereof and further providing that the 500' lateral setback authorization is only valid from one year of the date of the order. If no well is drilled and the 500' lateral setback is not renewed prior to the expiration of one year, the lateral setback for the first well in this unit shall be 1320' from the side boundaries;
  - (iii)   Vacating Order 553-2012 and amending Order 552-2012 to clarify that said order is limited to oil and natural gas production from the Bakken/Three Forks Formation from the Lone Butte Patricia #24-25 1H well; and
  - (iv)    Any other relief that the Board may deem necessary and appropriate.

Dated March 3, 2026.

CONTINENTAL RESOURCES INC.

By Scotti Gray  
Scotti Gray  
Attorney for Applicant

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

IN THE MATTER OF THE APPLICATION  
OF CONTINENTAL RESOURCES INC.  
FOR AUTHORIZATION TO DRILL UP TO  
THREE ADDITIONAL HORIZONTAL  
BAKKEN/THREE FORKS FORMATION  
WELLS IN THE SPACING UNIT  
COMPRISED OF 22, 23 AND 24  
TOWNSHIP 25 NORTH, RANGE 56 EAST,  
RICHLAND COUNTY, MONTANA, AT  
ANY LOCATION NOT CLOSER THAN  
500 FEET TO THE SIDE BOUNDARIES  
AND 200 FEET TO THE TOE/HEEL  
BOUNDARIES OF SAID SPACING UNIT

MBOGC Docket No.

276-2026

APPLICATION

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

**[A] Presents the following application:**

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

Township 25 North, Range 56 East  
Section 22: S2SW

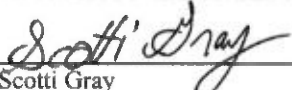
**[B] Requests:**

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

March 2, 2026.

CONTINENTAL RESOURCES INC.

By



Scotti Gray

Attorney for Applicant

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

IN THE MATTER OF THE APPLICATION OF CONTINENTAL RESOURCES INC. FOR AN ORDER DESIGNATING AN OVERLAPPING TEMPORARY SPACING UNIT COMPRISED OF ALL OF SECTIONS 25, 26, 27 AND 28 TOWNSHIP 25 NORTH, RANGE 56 EAST, RICHLAND COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT ANY LOCATION NOT CLOSER THAN 200 FEET FROM HEEL/TOE BOUNDARY AND 500 FEET FROM THE SIDE BOUNDARIES OF SAID TEMPORARY SPACING UNIT.

MBOGC Docket No.

277-2026

APPLICATION

APPLICANT FURTHER REQUESTS THAT BOARD ORDER 552-2012 POOLING SECTIONS 24 AND 25, T25N, R56E BE AMENDED TO CLARIFY THAT SAID ORDER IS LIMITED TO OIL AND ASSOCIATED NATURAL GAS PRODUCED FROM THE BAKKEN/THREE FORKS FORMATION FROM THE LONE BUTTE PATRICIA #24-25 WELL AND THAT ORDER 553-2012 AUTHORIZING THREE ADDITIONAL WELLS BE VACATED

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

**[A] Presents the following application:**

1. Applicant is an interest owner and operator within Sections 25, 26, 27 and 28, Township 25 North, Range 56 East, Richland County, Montana, which tracts are presently spaced with respect to the Bakken/Three Forks Formation by Order:

- 551-2012 – creating a permanent spacing unit comprised of All of Sections 24 and 25, T25N, R56E for oil and gas production from the Lone Butte Patricia #24-25 1H well.
  - 553-2012 authorizing 3 additional wells in the Lone Butte Patricia #24-25 1H unit.

Whiting Oil and Gas Corporation operates the Lone Butte Patricia #24-25 1H well within the PSU. Continental has obtained, or will obtain, Whiting Oil and Gas Corporation's written consent for this OTSU application prior to the hearing on this matter.

2. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill a horizontal Bakken/Three Forks formation well within, but not closer than 200 feet to the heel/toe exterior boundaries and 500 feet to the lateral boundaries, of a temporary spacing unit ("TSU") comprised of Sections 25, 26, 27 and 28, Township 25 North, Range 56 East, Richland County, Montana, subject to the condition that the temporary spacing unit be limited to production from the proposed horizontal well.
3. Applicant will, within 90 days of successful completion of the proposed horizontal operation, file an application for the Board's consideration of permanent spacing and other matters relation to production from the well.

[B] **Requests:**

1. This matter be set for hearing and placed on the Docket, with notice given as required by law.
2. After hearing the matter, the Montana Board of Oil & Gas Conservation enter its order:
  - (i) Delineating an OTSU comprised of Sections 25, 26, 27 and 28, Township 25 North; Range 56 East, Richland County, Montana be established subject to the conditions that the overlapping temporary spacing unit shall be limited to production from the proposed horizontal well, and that within 90 days of successful completion of the proposed horizontal operation, Applicant file an application for Board consideration of permanent spacing and all other matters relating to production of said well;
  - (ii) Authorizing the Applicant to locate its proposed horizontal well anywhere within such OTSU but not closer than 200 feet to the toe/heel boundaries and no further than 500 feet from the side boundaries thereof and further providing that the 500' lateral setback authorization is only valid from one year of the date of the order. If no well is drilled and the 500' lateral setback is not renewed prior to the expiration of one year, the lateral setback for the first well in this unit shall be 1320' from the side boundaries;
  - (iii) Vacating Order 553-2012 and amending Order 552-2012 to clarify that said spacing unit is limited to oil and natural gas production from the Bakken/Three Forks Formation from the Lone Butte Patricia #24-25 1H well; and
  - (iv) Any other relief that the Board may deem necessary and appropriate.

Dated March 3, 2026.

CONTINENTAL RESOURCES INC.

By Scotti Gray  
Scotti Gray  
Attorney for Applicant

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

IN THE MATTER OF THE APPLICATION  
OF CONTINENTAL RESOURCES INC.  
FOR AUTHORIZATION TO DRILL UP TO  
THREE ADDITIONAL HORIZONTAL  
BAKKEN/THREE FORKS FORMATION  
WELLS IN THE SPACING UNIT  
COMPRISED OF ALL OF SECTIONS 25,  
26, 27 AND 28 TOWNSHIP 25 NORTH,  
RANGE 56 EAST, RICHLAND COUNTY,  
MONTANA, AT ANY LOCATION NOT  
CLOSER THAN 500 FEET TO THE SIDE  
BOUNDARIES AND 200 FEET TO THE  
TOE/HEEL BOUNDARIES OF SAID  
SPACING UNIT

MBOGC Docket No.

278-2026

APPLICATION

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

**[A] Presents the following application:**

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

**[B] Requests:**

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

March 3, 2026.

CONTINENTAL RESOURCES INC.

By Scotti Gray  
Scotti Gray  
Attorney for Applicant

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

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IN THE MATTER OF THE APPLICATION OF PHOENIX OPERATING LLC, FOR AN ORDER CREATING A TEMPORARY SPACING UNIT ("TSU") COMPRISED OF ALL OF SECTIONS 30 AND 31, TOWNSHIP 23 NORTH, RANGE 60 EAST, RICHLAND COUNTY, MONTANA, AND ALL OF SECTIONS 6 AND 7, TOWNSHIP 22 NORTH, RANGE 60 EAST, RICHLAND COUNTY, MONTANA AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT ANY LOCATION NOT CLOSER THAN 200' (HEEL/TOE SETBACK)/500' (LATERAL SETBACK) TO THE BOUNDARIES OF SAID TSU, VACATING MBOGC ORDER NOS. 106-2008, 12-2010, AND 380-2011, AND FURTHER RELIEF AS THE MBOGC MAY DEEM APPROPRIATE.

**MBOGC DOCKET NO.** 297-2026

**APPLICATION**

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**PHOENIX OPERATING LLC** (the "Applicant"), South Ulster Street, Suite 1510, Denver, Colorado, 80237, presents the following Application:

1. Applicant is an interest owner and operator of oil and gas leasehold interests within all or portions of all of Sections 30 and 31, Township 23 North, Range 60 East, M.P.M., Richland County, Montana, and Sections 6 and 7, Township 22 North, Range 60 East, M.P.M., Richland County, Montana (the "Application Lands").
2. Sections 30 and 31, Township 23 North, Range 60 East, M.P.M., Richland County, Montana, are presently subject to the areawide state spacing order for Bakken/Three Forks production, Montana Board of Oil and Gas Conservation ("MBOGC") Order No. 380-2011.
3. Sections 6 and 7, Township 22 North, Range 60 East, M.P.M., Richland County, Montana, are presently subject to MBOGC Order No. 106-2008, a permanent spacing order for said portion of the Application Lands and MBOGC Order No. 12-2010, for an additional well in the same permanent spacing unit.
4. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill a horizontal Bakken/Three Forks formation well at any location, but not closer than 200' (heel/toe setback)/ 500' (lateral setback) to the exterior boundaries of a TSU comprised of Sections 30 and 31, Township 23 North, Range 60 East, M.P.M., Richland County, Montana, and Sections 6 and 7, Township 22 North, Range 60 East, M.P.M., Richland County, Montana.
5. Applicant believes their request prevents the waste of oil and gas, avoids the drilling of unnecessary wells, and protects the correlative rights of all interested parties.

6. Applicant will, within ninety (90) days of successful completion of the proposed horizontal operation, file an application for MBOGC consideration of permanent spacing and other matters relating to production from said wells.
7. Applicant notes that federal minerals are located within certain tracts affected by this application, namely Section 30, Township 23 North, Range 60 East, M.P.M., and Section 6, Township 22 North, Range 60 East, M.P.M.

**Applicant Requests:**

1. This matter be set for hearing, with notice given as required by law;
2. After hearing the matter, MBOGC enter its order creating a TSU comprised of Sections 30 and 31, Township 23 North, Range 60 East, M.P.M., Richland County, Montana, and Sections 6 and 7, Township 22 North, Range 60 East M.P.M., Richland County, Montana, and authorizing the drilling of a horizontal Bakken/Three Forks formation well at any location within such TSU but not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries thereof, providing that operations for the drilling of such well must be commenced within one year from the date of such order; and (ii) vacating MBOGC Order Nos. 380-2011, 106-2008, and 12-2010 insofar as they apply to the Application Lands; and
3. For such other or additional relief as MBOGC may deem appropriate.

DATED this 5th day of March 2026.

**PHOENIX OPERATING LLC**

By Kelley 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](mailto:klh@klhadvisors.com)

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

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IN THE MATTER OF THE APPLICATION OF PHOENIX OPERATING LLC, FOR AN ORDER AUTHORIZING THE DRILLING OF THREE ADDITIONAL HORIZONTAL BAKKEN/THREE FORKS FORMATION WELLS IN THE TEMPORARY SPACING UNIT ("TSU") COMPRISED OF ALL OF SECTIONS 30 AND 31, TOWNSHIP 23 NORTH, RANGE 60 EAST, RICHLAND COUNTY, MONTANA, AND ALL OF SECTIONS 6 AND 7, TOWNSHIP 22 NORTH, RANGE 60 EAST, RICHLAND COUNTY, MONTANA, FROM ANY LOCATION BUT NOT CLOSER THAN 200' (HEEL/TOE SETBACK)/500' (LATERAL SETBACK) TO THE BOUNDARIES OF SAID TSU, AND SUCH OTHER AND FURHTER RELIEF AS THE BOARD MAY DEEM APPROPRIATE.

**MBOGC DOCKET NO.** 200-2026

**APPLICATION**

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**PHOENIX OPERATING LLC** (the "Applicant"), South Ulster Street, Suite 1510, Denver, Colorado, 80237, presents the following Application:

1. Applicant is an interest owner and operator of oil and gas leasehold interests within all or portions of Sections 30 and 31, Township 23 North, Range 60 East, Richland County, Montana, and Sections 6 and 7, Township 22 North, Range 60 East, Richland County, Montana (the "Application Lands"). It is anticipated that said Application Lands will comprise a TSU for purposes of Bakken/Three Forks formation production pursuant to Montana Board of Oil and Gas Conservation Order No. \_\_\_\_\_ - 2026.
2. Applicant requests authorization from the Board to drill up to three additional horizontal Bakken/Three Forks formation wells from any location within the TSU, but not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries of the TSU, if in Applicant's judgment as operator of the TSU such action appears reasonable and prudent.
3. Applicant notes that federal minerals are located within certain tracts affected by this application, namely Section 30, Township 23 North, Range 60 East, M.P.M., and Section 6, Township 22 North, Range 60 East, M.P.M.

**Applicant Requests:**

1. This matter be set for hearing, with notice given as required by law;
2. After hearing the matter, the Board enter its order authorizing Applicant to drill up to three additional horizontal Bakken/Three Forks formation wells within the TSU, but not closer than 200' (hell/toe setback)/ 500' (lateral setback) to the exterior boundaries of a TSU comprised of all or portions of Sections 30 And 31, Township 23 North, Range 60 East,

M.P.M., Richland County, Montana, and Sections 6 And 7, Township 22 North, Range 60 East, M.P.M. Richland County, Montana; and

3. For such other or additional relief as MBOGC may deem appropriate.

DATED this 5th day of March 2026.

**PHOENIX OPERATING LLC**

By *Kelley 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](mailto:klh@klhadvisors.com)

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

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

IN THE MATTER OF THE APPLICATION OF KRAKEN OIL & GAS LLC FOR AN ORDER CREATING AN OVERLAPPING TEMPORARY SPACING UNIT ("OTSU") COMPRISED OF ALL OF SECTIONS 4, 5 AND 6, TOWNSHIP 31 NORTH, RANGE 59 EAST, M.P.M., SHERIDAN COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT ANY LOCATION NOT CLOSER THAN 200' (HEEL/TOE SETBACK)/500' (LATERAL SETBACK) TO THE BOUNDARIES OF SAID OTSU, CLARIFYING MBOGC ORDER NO. 64-2013 AND BLM ORDER NO. 1-2013 FED, VACATING MBOGC ORDER NO. 380-2011, AND SUCH OTHER AND FURTHER RELIEF AS THE MBOGC MAY DEEM APPROPRIATE

BLM DOCKET NO. 47-2026

MBOGC DOCKET NO. 296-2026

APPLICATION

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

[A] Presents the following application:

1. Applicant is an interest owner and operator within all or portions of Sections 4, 5, 6, 7, 8 and 9, Township 31 North, Range 59 East, M.P.M., Sheridan County, Montana. Said Sections 4 and 9 are presently subject to MBOGC Order No. 64-2013 and BLM Order No. 1-2013 FED. Said Sections 5, 6, 7 and 8 are presently subject only to the areawide state spacing order for Bakken/Three Forks production, MBOGC Order No. 380-2011. Kraken Oil & Gas LLC operates the Sorenson #34-9H well in the PSU comprised of All of Sections 4 and 9, Township 31 North, Range 59 East, M.P.M.

2. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill a horizontal Bakken/Three Forks formation well at a location within, but not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries of, an OTSU comprised of All of Sections 4, 5 and 6, Township 31 North, Range 59 East, M.P.M. To preserve the correlative rights of all interest owners in said Sections 4 and 9, MBOGC Order No. 64-2013 and BLM Order No. 1-2013 FED should be amended to clarify that said orders are limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the Sorenson #34-9H well. Additionally, it will be necessary to vacate MBOGC Order No. 380-2011 insofar as it applies to Sections 5, 6, 7 and 8, Township 31 North, Range 59 East, M.P.M.

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

4. A portion of the subject lands is Indian land, namely the NW/4 of Section 6, and the SW/4 of Section 9, and accordingly, the MOU between the United States BLM and the MBOGC is applicable hereto.

[B] Requests:

1. This matter be set for hearing in conjunction with the MBOGC hearings to be held April 9, 2026, with notice given as required by law and the MOU; and

2. After hearing the matter, the Board and BLM enter orders (i) creating an OTSU comprised of All of Sections 4, 5 and 6, Township 31 North, Range 59 East, M.P.M., Sheridan County, Montana, and authorizing the

drilling of a horizontal Bakken/Three Forks formation well at any location within such OTSU but not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries thereof, providing that operations for the drilling of such well must be commenced prior to the date of the Board's regularly-scheduled April 2027 hearings, and further providing that the OTSU shall be limited to production from the proposed horizontal well; (ii) amending MBOGC Order No. 64-2013 and BLM Order No. 1-2013 FED to clarify that said orders are limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the Sorenson #34-9H well; and (iii) vacating MBOGC Order No. 380-2011 insofar as it applies to Sections 5, 6, 7 and 8, Township 31 North, Range 59 East, M.P.M.

DATED this 4<sup>th</sup> day of March, 2026.

**KRAKEN OIL & GAS LLC**



By \_\_\_\_\_

John R. Lee, Its Attorney

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

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

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

IN THE MATTER OF THE APPLICATION OF KRAKEN OIL & GAS LLC FOR AN ORDER AUTHORIZING THE DRILLING OF UP TO THREE ADDITIONAL HORIZONTAL BAKKEN/THREE FORKS FORMATION WELLS IN THE OVERLAPPING TEMPORARY SPACING UNIT ("OTSU") COMPRISED OF ALL OF SECTIONS 4, 5 AND 6, TOWNSHIP 31 NORTH, RANGE 59 EAST, M.P.M., SHERIDAN COUNTY, MONTANA, AT ANY LOCATIONS NOT CLOSER THAN 200' (HEEL/TOE SETBACK)/500' (LATERAL SETBACK) TO THE BOUNDARIES THEREOF, AND SUCH OTHER AND FURTHER RELIEF AS THE MBOGC MAY DEEM APPROPRIATE

BLM DOCKET NO. 49-2026

MBOGC DOCKET NO. 297-2026

APPLICATION

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

[A] Presents the following application:

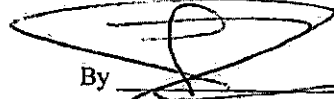
1. Applicant is an interest owner and operator within all or portions of Sections 4, 5 and 6, Township 31 North, Range 59 East, M.P.M., Sheridan County, Montana. It is anticipated that said lands will comprise an overlapping temporary spacing unit ("OTSU") for purposes of Bakken/Three Forks formation production pursuant to Montana Board of Oil and Gas Conservation Order No. \_\_\_-2026.
2. Applicant requests authority to drill up to three additional horizontal Bakken/Three Forks formation wells within said OTSU, at any locations not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries thereof, if in its judgment as operator of the OTSU such operations appear reasonable and prudent.
3. A portion of the subject lands is Indian land, namely the NW/4 of Section 6, and accordingly, the MOU between the United States BLM and the MBOGC is applicable hereto.

[B] Requests:

1. This matter be set for hearing in conjunction with the MBOGC hearings to be held April 9, 2026, with notice given as required by law and the MOU; and
2. After hearing the matter, the BLM and MBOGC enter their respective orders authorizing the Applicant to drill up to three additional horizontal Bakken/Three Forks formation wells at any locations within, but not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries of, the OTSU comprised of All of Sections 4, 5 and 6, Township 31 North, Range 59 East, M.P.M., Sheridan County, Montana.

DATED this 4<sup>th</sup> day of March, 2026.

**KRAKEN OIL & GAS LLC**



By

John R. Lee, Its Attorney

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

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

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

IN THE MATTER OF THE APPLICATION OF KRAKEN OIL & GAS LLC FOR AN ORDER CREATING AN OVERLAPPING TEMPORARY SPACING UNIT ("OTSU") COMPRISED OF ALL OF SECTIONS 7, 8 AND 9, TOWNSHIP 31 NORTH, RANGE 59 EAST, M.P.M., SHERIDAN COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT ANY LOCATION NOT CLOSER THAN 200' (HEEL/TOE SETBACK)/500' (LATERAL SETBACK) TO THE BOUNDARIES OF SAID OTSU, CLARIFYING MBOGC ORDER NO. 64-2013 AND BLM ORDER NO. 1-2013 FED, VACATING MBOGC ORDER NO. 380-2011, AND SUCH OTHER AND FURTHER RELIEF AS THE MBOGC MAY DEEM APPROPRIATE

BLM DOCKET NO. 49-2026

MBOGC DOCKET NO. 299-2026

APPLICATION

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

**[A] Presents the following application:**

1. Applicant is an interest owner and operator within all or portions of Sections 4, 5, 6, 7, 8 and 9, Township 31 North, Range 59 East, M.P.M., Sheridan County, Montana. Said Sections 4 and 9 are presently subject to MBOGC Order No. 64-2013 and BLM Order No. 1-2013 FED. Said Sections 5, 6, 7 and 8 are presently subject only to the areawide state spacing order for Bakken/Three Forks production, MBOGC Order No. 380-2011. Kraken Oil & Gas LLC operates the Sorenson #34-9H well in the PSU comprised of All of Sections 4 and 9, Township 31 North, Range 59 East, M.P.M.
2. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill a horizontal Bakken/Three Forks formation well at a location within, but not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries of, an OTSU comprised of All of Sections 7, 8 and 9, Township 31 North, Range 59 East, M.P.M. To preserve the correlative rights of all interest owners in said Sections 4 and 9, MBOGC Order No. 64-2013 and BLM Order No. 1-2013 FED should be amended to clarify that said orders are limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the Sorenson #34-9H well. Additionally, it will be necessary to vacate MBOGC Order No. 380-2011 insofar as it applies to Sections 5, 6, 7 and 8, Township 31 North, Range 59 East, M.P.M.
3. Applicant will, within 90 days of successful completion of the proposed horizontal operation, file an application for Board consideration of permanent spacing and other matters relating to production from said well.
4. A portion of the subject lands is Indian land, namely the NW/4 of Section 6, and the SW/4 of Section 9, and accordingly, the MOU between the United States BLM and the MBOGC is applicable hereto.

**[B] Requests:**

1. This matter be set for hearing in conjunction with the MBOGC hearings to be held April 9, 2026, with notice given as required by law and the MOU; and
2. After hearing the matter, the Board and BLM enter orders (i) creating an OTSU comprised of All of Sections 7, 8 and 9, Township 31 North, Range 59 East, M.P.M., Sheridan County, Montana, and authorizing the

drilling of a horizontal Bakken/Three Forks formation well at any location within such OTSU but not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries thereof, providing that operations for the drilling of such well must be commenced prior to the date of the Board's regularly-scheduled April 2027 hearings, and further providing that the OTSU shall be limited to production from the proposed horizontal well; (ii) amending MBOGC Order No. 64-2013 and BLM Order No. 1-2013 FED to clarify that said orders are limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the Sorenson #34-9H well; and (iii) vacating MBOGC Order No. 380-2011 insofar as it applies to Sections 5, 6, 7 and 8, Township 31 North, Range 59 East, M.P.M.

DATED this 4<sup>th</sup> day of March, 2026.

**KRAKEN OIL & GAS LLC**



By \_\_\_\_\_

John R. Lee, Its Attorney

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

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

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

IN THE MATTER OF THE APPLICATION OF KRAKEN OIL & GAS LLC FOR AN ORDER AUTHORIZING THE DRILLING OF UP TO THREE ADDITIONAL HORIZONTAL BAKKEN/THREE FORKS FORMATION WELLS IN THE OVERLAPPING TEMPORARY SPACING UNIT ("OTSU") COMPRISED OF ALL OF SECTIONS 7, 8 AND 9, TOWNSHIP 31 NORTH, RANGE 59 EAST, M.P.M., SHERIDAN COUNTY, MONTANA, AT ANY LOCATIONS NOT CLOSER THAN 200' (HEEL/TOE SETBACK)/500' (LATERAL SETBACK) TO THE BOUNDARIES THEREOF, AND SUCH OTHER AND FURTHER RELIEF AS THE MBOGC MAY DEEM APPROPRIATE

BLM DOCKET NO. 50-2026

MBOGC DOCKET NO. 299-2026

APPLICATION

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

[A] Presents the following application:

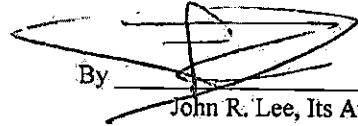
1. Applicant is an interest owner and operator within all or portions of Sections 7, 8 and 9, Township 31 North, Range 59 East, M.P.M., Sheridan County, Montana. It is anticipated that said lands will comprise an overlapping temporary spacing unit ("OTSU") for purposes of Bakken/Three Forks formation production pursuant to Montana Board of Oil and Gas Conservation Order No. \_\_\_-2026.
2. Applicant requests authority to drill up to three additional horizontal Bakken/Three Forks formation wells within said OTSU, at any locations not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries thereof, if in its judgment as operator of the OTSU such operations appear reasonable and prudent.
3. A portion of the subject lands is Indian land, namely the SW/4 of Section 9, and accordingly, the MOU between the United States BLM and the MBOGC is applicable hereto.

[B] Requests:

1. This matter be set for hearing in conjunction with the MBOGC hearings to be held April 9, 2026, with notice given as required by law and the MOU; and
2. After hearing the matter, the BLM and MBOGC enter their respective orders authorizing the Applicant to drill up to three additional horizontal Bakken/Three Forks formation wells at any locations within, but not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries of, the OTSU comprised of All of Sections 7, 8 and 9, Township 31 North, Range 59 East, M.P.M., Sheridan County, Montana.

DATED this 4<sup>th</sup> day of March, 2026.

KRAKEN OIL & GAS LLC



By

John R. Lee, Its Attorney

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

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

IN THE MATTER OF THE APPLICATION OF KRAKEN OIL & GAS LLC FOR AN ORDER CREATING A TEMPORARY SPACING UNIT ("TSU") COMPRISED OF ALL OF SECTIONS 18, 19, 30 AND 31, TOWNSHIP 31 NORTH, RANGE 59 EAST, M.P.M., SHERIDAN COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT ANY LOCATION NOT CLOSER THAN 200' (HEEL/TOE SETBACK)/500' (LATERAL SETBACK) TO THE BOUNDARIES OF SAID TSU, VACATING MBOGC ORDER NOS. 60-2010, 63-2011 AND 265-2012, AND SUCH OTHER AND FURTHER RELIEF AS THE MBOGC MAY DEEM APPROPRIATE

**MBOGC DOCKET NO. 300-2026**

**APPLICATION**

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

**[A] Presents the following application:**

1. Applicant is an interest owner within all or portions of Sections 18, 19, 30 and 31, Township 31 North, Range 59 East, M.P.M., Sheridan County, Montana. Said Sections 18 and 19 are presently subject to MBOGC Order No. 60-2010. Said Sections 30 and 31 are presently subject to MBOGC Order Nos. 63-2011 and 265-2012.

2. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill a horizontal Bakken/Three Forks formation well at a location within, but not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries of, a TSU comprised of All of Sections 18, 19, 30 and 31, Township 31 North, Range 59 East, M.P.M. To grant the requested relief, it will be necessary to vacate MBOGC Order Nos. 60-2010, 63-2011 and 265-2012.

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

4. Applicant notes that no federal minerals appear to be affected by this application.

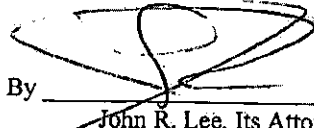
**[B] Requests:**

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

2. After hearing the matter, the Board enter its order (i) creating a TSU comprised of All of Sections 18, 19, 30 and 31, Township 31 North, Range 59 East, M.P.M., Sheridan County, Montana, and authorizing the drilling of a horizontal Bakken/Three Forks formation well at any location within such TSU but not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries thereof, providing that operations for the drilling of such well must be commenced prior to the date of the Board's regularly-scheduled April 2027 hearings; and (ii) vacating MBOGC Order Nos. 60-2010, 63-2011 and 265-2012.

DATED this 4<sup>th</sup> day of March, 2026.

**KRAKEN OIL & GAS LLC**



By \_\_\_\_\_

John R. Lee, Its Attorney

CROWLEY FLECK PLLP

P.O. Box 2529

Billings, MT 59103-2529

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

IN THE MATTER OF THE APPLICATION OF KRAKEN OIL & GAS LLC FOR AN ORDER AUTHORIZING THE DRILLING OF UP TO THREE ADDITIONAL HORIZONTAL BAKKEN/THREE FORKS FORMATION WELLS IN THE TEMPORARY SPACING UNIT ("TSU") COMPRISED OF ALL OF SECTIONS 18, 19, 30 AND 31, TOWNSHIP 31 NORTH, RANGE 59 EAST, M.P.M., SHERIDAN COUNTY, MONTANA, AT ANY LOCATIONS NOT CLOSER THAN 200' (HEEL/TOE SETBACK)/500' (LATERAL SETBACK) TO THE BOUNDARIES THEREOF, AND SUCH OTHER AND FURTHER RELIEF AS THE MBOGC MAY DEEM APPROPRIATE

**MBOGC DOCKET NO. 301-2026**

**APPLICATION**

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

**[A] Presents the following application:**

1. Applicant is an interest owner and operator within all or portions of Sections 18, 19, 30 and 31, Township 31 North, Range 59 East, M.P.M., Sheridan County, Montana. It is anticipated that said lands will comprise a temporary spacing unit ("TSU") for purposes of Bakken/Three Forks formation production pursuant to Montana Board of Oil and Gas Conservation Order No. \_\_\_-2026.
2. Applicant requests authority to drill up to three additional horizontal Bakken/Three Forks formation wells within said TSU, at any locations not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries thereof, if in its judgment as operator of the TSU such operations appear reasonable and prudent.
3. Applicant notes that no federal minerals appear to be affected by this application.

**[B] Requests:**

1. This matter be set for hearing, with notice given as required by law and the MOU;
2. After hearing the matter, the Board enter its order authorizing the Applicant to drill up to three additional horizontal Bakken/Three Forks formation wells at any locations within, but not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries of, the TSU comprised of Sections 18, 19, 30 and 31, Township 31 North, Range 59 East, M.P.M., Sheridan County, Montana.

DATED this 4<sup>th</sup> day of March, 2026.

**KRAKEN OIL & GAS LLC**

By \_\_\_\_\_

John R. Lee, Its Attorney

CROWLEY FLECK PLLP

P.O. Box 2529

Billings, MT 59103-2529

Email: [jlee@crowleyfleck.com](mailto:jlee@crowleyfleck.com)

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

IN THE MATTER OF THE APPLICATION OF KRAKEN OIL & GAS LLC FOR AN ORDER CREATING AN OVERLAPPING TEMPORARY SPACING UNIT ("OTSU") COMPRISED OF ALL OF SECTIONS 17, 20, 29 AND 32, TOWNSHIP 31 NORTH, RANGE 59 EAST, M.P.M., SHERIDAN COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT ANY LOCATION NOT CLOSER THAN 200' (HEEL/TOE SETBACK)/500' (LATERAL SETBACK) TO THE BOUNDARIES OF SAID OTSU, CLARIFYING MBOGC ORDER NO. 63-2013, VACATING MBOGC ORDER NO. 59-2010, AND SUCH OTHER AND FURTHER RELIEF AS THE MBOGC MAY DEEM APPROPRIATE

**MBOGC DOCKET NO. 302-2026**

**APPLICATION**

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

**[A] Presents the following application:**

1. Applicant is an interest owner and operator within all or portions of Sections 17, 20, 29 and 32, Township 31 North, Range 59 East, M.P.M., Sheridan County, Montana. Said Sections 17 and 20 are presently subject to MBOGC Order No. 59-2010. Said Sections 29 and 32 are presently subject to MBOGC Order No. 63-2013. Kraken Oil & Gas LLC operates the Raymond Sweet #31-29H well in the PSU comprised of All of Sections 29 and 32, Township 31 North, Range 59 East, M.P.M.

2. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill a horizontal Bakken/Three Forks formation well at a location within, but not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries of, an OTSU comprised of All of Sections 17, 20, 29 and 32, Township 31 North, Range 59 East, M.P.M. To preserve the correlative rights of all interest owners in said Sections 29 and 32, MBOGC Order No. 63-2013 should be amended to clarify that said order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the Raymond Sweet #31-29H well. It will also be necessary to vacate MBOGC Order No. 59-2010.

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

4. Applicant notes that federal minerals are located within certain tracts affected by this application, namely the NE/4NE/4 of Section 20, Township 31 North, Range 59 East, M.P.M.

**[B] Requests:**

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

2. After hearing the matter, the Board enter its order (i) creating an OTSU comprised of All of Sections 17, 20, 29 and 32, Township 31 North, Range 59 East, M.P.M., Sheridan County, Montana, and authorizing the drilling of a horizontal Bakken/Three Forks formation well at any location within such OTSU but not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries thereof, providing that operations for the drilling of such well must be commenced prior to the date of the Board's regularly-scheduled April 2027 hearings; (ii) amending MBOGC Order No. 63-2013 to clarify that said order is limited to oil and

associated natural gas produced from the Bakken/Three Forks formation from the Raymond Sweet #31-29H well;  
and (iii) vacating MBOGC Order No. 59-2010.

DATED this 4<sup>th</sup> day of March, 2026.

**KRAKEN OIL & GAS LLC**



By \_\_\_\_\_

John R. Lee, Its Attorney

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

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

IN THE MATTER OF THE APPLICATION OF KRAKEN OIL & GAS LLC FOR AN ORDER AUTHORIZING THE DRILLING OF UP TO THREE ADDITIONAL HORIZONTAL BAKKEN/THREE FORKS FORMATION WELLS IN THE OVERLAPPING TEMPORARY SPACING UNIT ("OTSU") COMPRISED OF ALL OF SECTIONS 17, 20, 29 AND 32, TOWNSHIP 31 NORTH, RANGE 59 EAST, M.P.M., SHERIDAN COUNTY, MONTANA, AT ANY LOCATIONS NOT CLOSER THAN 200' (HEEL/TOE SETBACK)/500' (LATERAL SETBACK) TO THE BOUNDARIES THEREOF, AND SUCH OTHER AND FURTHER RELIEF AS THE MBOGC MAY DEEM APPROPRIATE

**MBOGC DOCKET NO. 303-2026**

**APPLICATION**

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

**[A] Presents the following application:**

1. Applicant is an interest owner and operator within all or portions of Sections 17, 20, 29 and 32, Township 31 North, Range 59 East, M.P.M., Sheridan County, Montana. It is anticipated that said lands will comprise an overlapping temporary spacing unit ("OTSU") for purposes of Bakken/Three Forks formation production pursuant to Montana Board of Oil and Gas Conservation Order No. \_\_-2026.

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

3. Applicant notes that federal minerals are located within certain tracts affected by this application, namely the NE/4NE/4 of Section 20, Township 31 North, Range 59 East, M.P.M.

**[B] Requests:**

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

2. After hearing the matter, the Board enter its order authorizing the Applicant to drill up to three additional horizontal Bakken/Three Forks formation wells at any locations within, but not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries of, the OTSU comprised of Sections 17, 20, 29 and 32, Township 31 North, Range 59 East, M.P.M., Sheridan County, Montana.

DATED this 4<sup>th</sup> day of March, 2026.

**KRAKEN OIL & GAS LLC**

By 

John R. Lee, Its Attorney

CROWLEY FLECK PLLP

P.O. Box 2529

Billings, MT 59103-2529

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

IN THE MATTER OF THE APPLICATION OF KRAKEN OIL & GAS LLC FOR AN ORDER CREATING AN OVERLAPPING TEMPORARY SPACING UNIT ("OTSU") COMPRISED OF ALL OF SECTIONS 1, 12, 13 AND 24, TOWNSHIP 31 NORTH, RANGE 58 EAST, M.P.M., SHERIDAN COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT ANY LOCATION NOT CLOSER THAN 200' (HEEL/TOE SETBACK)/500' (LATERAL SETBACK) TO THE BOUNDARIES OF SAID OTSU, CLARIFYING MBOGC ORDER NOS. 447-2012 AND 445-2012, AND SUCH OTHER AND FURTHER RELIEF AS THE MBOGC MAY DEEM APPROPRIATE

**MBOGC DOCKET NO. 304-2026**

**APPLICATION**

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

**[A] Presents the following application:**

1. Applicant is an interest owner and operator within all or portions of Sections 1, 12, 13 and 24, Township 31 North, Range 58 East, M.P.M., Sheridan County, Montana. Said Sections 1 and 12 are presently subject to MBOGC Order Nos. 446-2012 and 447-2012. Said Sections 13 and 24 are presently subject to MBOGC Order Nos. 444-2012 and 445-2012. Kraken Oil & Gas LLC operates the Orville Hendrickson #24-12H well in the PSU comprised of All of Sections 1 and 12, Township 31 North, Range 58 East, M.P.M., as well as the Dave Clark #21-13H well in the PSU comprised of All of Sections 13 and 24, Township 31 North, Range 58 East, M.P.M.
2. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill a horizontal Bakken/Three Forks formation well at a location within, but not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries of, an OTSU comprised of All of Sections 1, 12, 13 and 24, Township 31 North, Range 58 East, M.P.M. To preserve the correlative rights of all interest owners in said Sections 1 and 12, MBOGC Order No. 447-2012 should be amended to clarify that said order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the Orville Hendrickson #24-12H well. To preserve the correlative rights of all interest owners in said Sections 13 and 24, MBOGC Order No. 445-2012 should be amended to clarify that said order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the Dave Clark #21-13H well.
3. Applicant will, within 90 days of successful completion of the proposed horizontal operation, file an application for Board consideration of permanent spacing and other matters relating to production from said well.
4. Applicant notes that no federal minerals appear to be affected by this application.


**[B] Requests:**

1. This matter be set for hearing, with notice given as required by law and the MOU;
2. After hearing the matter, the Board enter its order (i) creating an OTSU comprised of All of Sections 1, 12, 13 and 24, Township 31 North, Range 58 East, M.P.M., Sheridan County, Montana, and authorizing the drilling of a horizontal Bakken/Three Forks formation well at any location within such OTSU but not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries thereof, providing that operations for the drilling of such well must be commenced prior to the date of the Board's regularly-scheduled April 2027 hearings;

(ii) amending MBOGC Order No. 447-2012 to clarify that said order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the Hendrickson #24-12H well; and (iii) amending MBOGC Order No. 445-2012 to clarify that said order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the Dave Clark #21-13H well.

DATED this 4<sup>th</sup> day of March, 2026.

**KRAKEN OIL & GAS LLC**

  
By \_\_\_\_\_  
John R. Lee, Its Attorney

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

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

IN THE MATTER OF THE APPLICATION OF KRAKEN OIL & GAS LLC FOR AN ORDER AUTHORIZING THE DRILLING OF UP TO THREE ADDITIONAL HORIZONTAL BAKKEN/THREE FORKS FORMATION WELLS IN THE OVERLAPPING TEMPORARY SPACING UNIT ("OTSU") COMPRISED OF ALL OF SECTIONS 1, 12, 13 AND 24, TOWNSHIP 31 NORTH, RANGE 58 EAST, M.P.M., SHERIDAN COUNTY, MONTANA, AT ANY LOCATIONS NOT CLOSER THAN 200' (HEEL/TOE SETBACK)/500' (LATERAL SETBACK) TO THE BOUNDARIES THEREOF, AND SUCH OTHER AND FURTHER RELIEF AS THE MBOGC MAY DEEM APPROPRIATE

**MBOGC DOCKET NO. 305-2026**

**APPLICATION**

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

**[A] Presents the following application:**

1. Applicant is an interest owner and operator within all or portions of Sections 1, 12, 13 and 24, Township 31 North, Range 58 East, M.P.M., Sheridan County, Montana. It is anticipated that said lands will comprise an overlapping temporary spacing unit ("OTSU") for purposes of Bakken/Three Forks formation production pursuant to Montana Board of Oil and Gas Conservation Order No. \_\_\_-2026.
2. Applicant requests authority to drill up to three additional horizontal Bakken/Three Forks formation wells within said OTSU, at any locations not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries thereof, if in its judgment as operator of the OTSU such operations appear reasonable and prudent.
3. Applicant notes that no federal minerals appear to be affected by this application.

**[B] Requests:**

1. This matter be set for hearing, with notice given as required by law and the MOU;
2. After hearing the matter, the Board enter its order authorizing the Applicant to drill up to three additional horizontal Bakken/Three Forks formation wells at any locations within, but not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries of, the OTSU comprised of Sections 1, 12, 13 and 24, Township 31 North, Range 58 East, M.P.M., Sheridan County, Montana.

DATED this 4<sup>th</sup> day of March, 2026.

**KRAKEN OIL & GAS LLC**

By 

John R. Lee, Its Attorney

CROWLEY FLECK PLLP

P.O. Box 2529

Billings, MT 59103-2529

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

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

IN THE MATTER OF THE APPLICATION OF KRAKEN OIL & GAS LLC FOR AN ORDER CREATING AN OVERLAPPING TEMPORARY SPACING UNIT ("OTSU") COMPRISED OF ALL OF SECTIONS 2, 11, 14 AND 23, TOWNSHIP 31 NORTH, RANGE 58 EAST, M.P.M., SHERIDAN COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT ANY LOCATION NOT CLOSER THAN 200' (HEEL/TOE SETBACK)/500' (LATERAL SETBACK) TO THE BOUNDARIES OF SAID OTSU, CLARIFYING MBOGC ORDER NO. 165-2012 AND THE CORRESPONDING BLM ORDER (NUMBER UNKNOWN), VACATING MBOGC ORDER NOS. 5-2011, 394-2011 AND 262-2012 AND THE CORRESPONDING BLM ORDERS (NUMBERS UNKNOWN), AND SUCH OTHER AND FURTHER RELIEF AS THE MBOGC MAY DEEM APPROPRIATE

BLM DOCKET NO. 51-2026

MBOGC DOCKET NO. 306-2026

APPLICATION

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

[A] **Presents the following application:**

1. Applicant is an interest owner and operator within all or portions of Sections 2, 11, 14 and 23, Township 31 North, Range 58 East, M.P.M., Sheridan County, Montana. Said Sections 2 and 11 are presently subject to MBOGC Order No. 165-2012 and corresponding BLM Order (number unknown). Said Sections 14 and 23 are presently subject to MBOGC Order Nos. 5-2011, 394-2011 and 262-2012 and the corresponding BLM Orders (numbers unknown). Kraken Oil & Gas LLC operates the Wegner #34-11H well in the PSU comprised of All of Sections 2 and 11, Township 31 North, Range 58 East, M.P.M.
2. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the captioned lands, Applicant proposes to drill a horizontal Bakken/Three Forks formation well at a location within, but not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries of, an OTSU comprised of All of Sections 2, 11, 14 and 23, Township 31 North, Range 58 East, M.P.M. To preserve the correlative rights of all interest owners in said Sections 2 and 11, MBOGC Order No. 165-2012 and corresponding BLM Order (number unknown) should be amended to clarify that said orders are limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the Wegner #34-11H well. It will also be necessary to vacate MBOGC Order Nos. 5-2011, 394-2011 and 262-2012 and the corresponding BLM Orders (numbers unknown).
3. Applicant will, within 90 days of successful completion of the proposed horizontal operation, file an application for Board consideration of permanent spacing and other matters relating to production from said well.
4. A portion of the subject lands is Indian land, namely the NW/4 of Section 2, the W/2SW4 and SE/4SW4 of Section 14, and the NW/4NW/4 of Section 23, and accordingly, the MOU between the United States BLM and the MBOGC is applicable hereto.


**[B] Requests:**

1. This matter be set for hearing in conjunction with the MBOGC hearings to be held April 9, 2026, with notice given as required by law and the MOU; and

2. After hearing the matter, the BLM and MBOGC enter their respective orders (i) creating an OTSU comprised of All of Sections 2, 11, 14 and 23, Township 31 North, Range 58 East, M.P.M., Sheridan County, Montana, and authorizing the drilling of a horizontal Bakken/Three Forks formation well at any location within such OTSU but not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries thereof, providing that operations for the drilling of such well must be commenced prior to the date of the Board's regularly-scheduled April 2027 hearings; (ii) amending MBOGC Order No. 165-2012 and corresponding BLM Order (number unknown) to clarify that said orders are limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the Wegner #34-11H well; and (iii) vacating MBOGC Order Nos. 5-2011, 394-2011 and 262-2012 and the corresponding BLM Orders (numbers unknown).

DATED this 4<sup>th</sup> day of March, 2026.

**KRAKEN OIL & GAS LLC**

By   
John R. Lee, Its Attorney

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

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

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

IN THE MATTER OF THE APPLICATION OF KRAKEN OIL & GAS LLC FOR AN ORDER AUTHORIZING THE DRILLING OF UP TO THREE ADDITIONAL HORIZONTAL BAKKEN/THREE FORKS FORMATION WELLS IN THE OVERLAPPING TEMPORARY SPACING UNIT ("OTSU") COMPRISED OF ALL OF SECTIONS 2, 11, 14 AND 23, TOWNSHIP 31 NORTH, RANGE 58 EAST, M.P.M., SHERIDAN COUNTY, MONTANA, AT ANY LOCATIONS NOT CLOSER THAN 200' (HEEL/TOE SETBACK)/500' (LATERAL SETBACK) TO THE BOUNDARIES THEREOF, AND SUCH OTHER AND FURTHER RELIEF AS THE MBOGC MAY DEEM APPROPRIATE

**BLM DOCKET NO.** 52-2026

**MBOGC DOCKET NO.** 307-2026

**APPLICATION**

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

**[A] Presents the following application:**

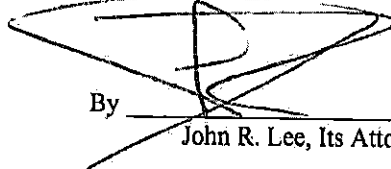
1. Applicant is an interest owner and operator within all or portions of Sections 2, 11, 14 and 23, Township 31 North, Range 58 East, M.P.M., Sheridan County, Montana. It is anticipated that said lands will comprise an overlapping temporary spacing unit ("OTSU") for purposes of Bakken/Three Forks formation production pursuant to Montana Board of Oil and Gas Conservation Order No. \_\_-2026.
2. Applicant requests authority to drill up to three additional horizontal Bakken/Three Forks formation wells within said OTSU, at any locations not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries thereof, if in its judgment as operator of the OTSU such operations appear reasonable and prudent.
3. A portion of the subject lands is Indian land, namely the NW/4 of Section 2, the W/2SW4 and SE/4SW/4 of Section 14, and the NW/4NW/4 of Section 23, and accordingly, the MOU between the United States BLM and the MBOGC is applicable hereto.

**[B] Requests:**

1. This matter be set for hearing in conjunction with the MBOGC hearings to be held April 9, 2026, with notice given as required by law and the MOU; and
2. After hearing the matter, the BLM and MBOGC enter their respective orders authorizing the Applicant to drill up to three additional horizontal Bakken/Three Forks formation wells at any locations within, but not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries of, the OTSU comprised of All of Sections 2, 11, 14 and 23, Township 31 North, Range 58 East, M.P.M., Sheridan County, Montana.

DATED this 4<sup>th</sup> day of March, 2026.

**KRAKEN OIL & GAS LLC**

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

By

John R. Lee, Its Attorney

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