Mark

FORM NO. 2 R 10/09

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MONTANA BOARD OF OIL & GAS CONSERVATION - BILLINGS

ARM 36.22.307, 601, 605, 1003, 1004, 1011, 1013, 1103, 1222, 1240, 1301, 1306, 1309, and 1417

Submit In Quadruplicate To:

MONTANA BOARD OF OIL AND GAS CONSERVATION
2535 ST. JOHNS AVENUE
BILLINGS, MONTANA 59102

SUNDRY NOTICES AND REPORT OF WELLS

Operator: PHOENIX OPERATING LLC

Address: 4643 SOUTH ULSTER STREET, SUITE 1510

City: DENVER State: CO Zip Code: 80237

Telephone: 303-548-1953 Fax:

Lease Name: MCMAHON

Type (Private/State/Federal/Tribal/Allotted): State

Well Number: 1 SWD

Location of well (1/4-1/4 section and footage measurements):
NENW Section 16, T28N, R56E, 462' FNL & 2635' FWL

Unit Agreement Name:

Field Name or Wildcat: Wildcat

Township, Range, and Section: Section 16, T28N, R56E

API Number: 25 | | | (State | County | Well)

Well Type (oil, gas, injection, other): INJECTION

County: Roosevelt

Indicate below with an X the nature of this notice, report, or other data:

Notice of Intention to Change Plans	☐	Subsequent Report of Mechanical Integrity Test	☐
Notice of Intention to Run Mechanical Integrity Test	☐	Subsequent Report of Stimulation or Treatment	☐
Notice of Intention to Stimulate or to Chemically Treat	☐	Subsequent Report of Perforation or Cementing	☐
Notice of Intention to Perforate or to Cement	☐	Subsequent Report of Well Abandonment	☐
Notice of Intention to Abandon Well	☐	Subsequent Report of Pulled or Altered Casing	☐
Notice of Intention to Pull or Alter Casing	☐	Subsequent Report of Drilling Waste Disposal	☐
Notice of Intention to Change Well Status	☐	Subsequent Report of Production Waste Disposal	☐
Supplemental Well History	☐	Subsequent Report of Change in Well Status	☐
Other (specify) Intent to drill and complete a	☒	Subsequent Report of Gas Analysis (ARM 36.22.1222)	☐
Class II Injection Well	☐		☐

Describe Proposed or Completed Operations:

Describe planned or completed work in detail. Attach maps, well-bore configuration diagrams, analyses, or other information as necessary. Indicate the intended starting date for proposed operations or the completion date for completed operations.

Phoenix respectfully requests approval to drill and complete a disposal well at the above-referenced location for the injection of Class II E&P waste. Notice has been provided to all parties within the quarter mile area of review.

An application for hearing has been docketed with the Montana Board of Oil and Gas Conservation and is scheduled for Thursday, December 10th, 2026.

BOARD USE ONLY

Approved _____ Date

Name Title

The undersigned hereby certifies that the information contained on this application is true and correct:

10/27/2026 Date

Meaghan Coughlan Signed (Agent)

Meaghan Coughlan, Sr. Regulatory Specialist
Print Name and Title

Telephone: 9739914262

PHOENIX | OPERATING COMPANY

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October 27, 2026

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

Attn: Mr. John Gizicki
UIC Program Manager

RE: Application for UIC Permit and Authorization to Drill a Class II Injection Well
Location of proposed Disposal Well & Facility: MCMAHON 1 SWD
NENW, Section 16, Township 28N, Range 56E. P.M.M.
Roosevelt County, Montana

Dear Mr. Gizicki,

Phoenix Operating LLC (Phoenix) respectfully requests approval of an Underground Injection Control (UIC) permit for the referenced location and as described in the attached application. Phoenix has provided notice to the appropriate parties within ¼ mile area of review of the proposed well location and requests that the application be placed on the docket for the MBOGC hearing scheduled December 10th, 2026.

If you have any questions concerning the enclosed application, please do not hesitate to reach out.

Sincerely,

Tori Siemieniewski
Director – Bakken Regulatory
Phoenix Operating LLC
701-870-2961

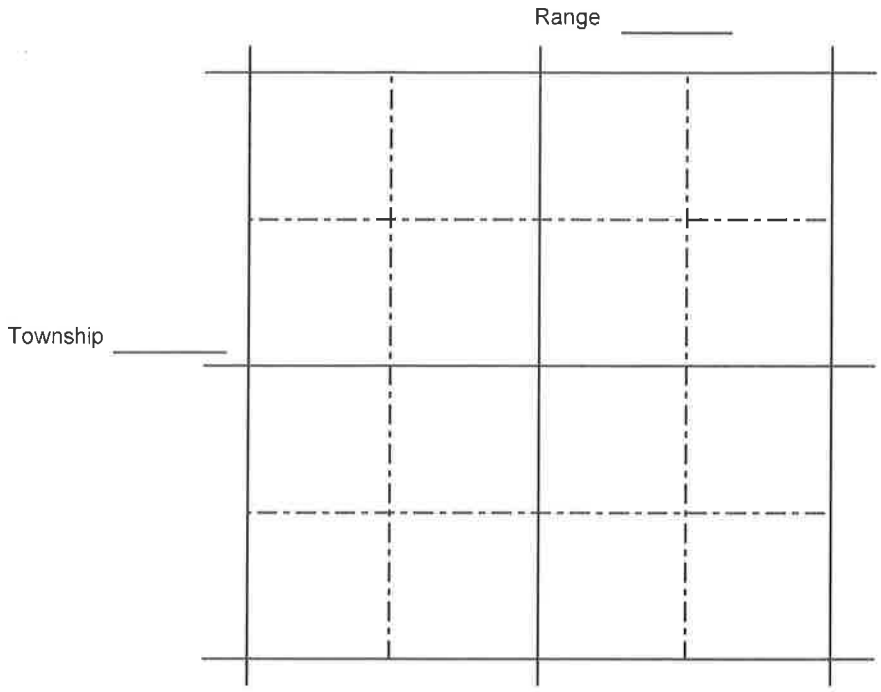
David Scadden
Chief Operating Officer
Phoenix Operating LLC
302-214-7909

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SUPPLEMENTAL INFORMATION

NOTE: Additional information or attachments may be required by Rule or by special request.

Plot the location of the well or site that is the subject of this notice or report.



BOARD USE ONLY	CONDITIONS OF APPROVAL

The operator must comply with the following condition(s) of approval:

Failure to comply with the conditions of approval may void this permit.

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UIC Plan
MCMAHON 1 SWD

1. Operator Description

Phoenix Operating LLC
4643 South Ulster Street, Suite 1510
Denver, CO 80237

2. Proposed Well Location

Well Name:	MCMAHON 1 SWD
Location:	462' FNL & 2635' FWL, Section 16, T28N, R56E, Roosevelt County.
Field:	Wildcat
Ungraded Ground Elevation:	2230'
Finished Pad Elevation:	2223'

3. Lithologic Description of the Proposed Injection & Confining Zone

Injection Zone: Inyan Kara Formation

Estimated Top: 5017' TVD
Estimated Thickness: 300'
Description: consists of alternating fluvial deltaic sandstones, siltstones, and shales varying thickness and lateral extent. Stratigraphic variability in the Inyan Kara is generally interpreted to be the result of multiple episodes of erosion and subsequent channel-filling.

Upper Confining Zone: Mowry Formation

Estimated Top: 4615' TVD
Estimated Thickness: 402'
Description: medium to dark gray, soft, flaky, often bentonitic, shale. Lower Cretaceous Dakota Group consists of offshore marine shales and bentonitic claystone.

Lower Confining Zone: Swift Formation

Estimated Top: 5317' TVD
Estimated Thickness: 773'
Description: dark gray to greenish, fissile, waxy, silty, and often calcareous shale. The Jurassic Swift formation lies conformably below the Inyan Kara. The Swift is made up of shallow marine shale and siltstone.

*Offset geologic tops calculated from Rogney 4-17(API#25085213880000).

4. Maximum Injection Pressure Calculation

Maximum injection pressure was determined utilizing the following formula in accordance with §146.23

MSIP = (Depth of Perf(TVD)) * (Frac. Grad.) - (Water Grad.)*(SG Injectate)*(Depth of Perf)

MSIP = Maximum Surface Injection Pressure (measured at surface)
Depth of Perf = Top Perf (TVD)
0.733 psi/ft = Fracture Gradient
0.433 psi/ft = Freshwater gradient, psi/ft.
SG Injectate = specific gravity (of injected fluid from produced water samples)
0.433 = freshwater gradient, psi/ft.

MSIP = (5566 *.733) - (0.433*1.03) * 5566
MSIP = 1598.93 psi

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5. Proposed Injection Program

The Operator plans to drill a saltwater injection well and inject into the Inyan Kara formation of the Dakota Group. See above sections 4 and 5 for proposed injection volume and pressure maximums. The well has no plans to take third party volumes at this time. The proposed well is to be utilized by wells drilled from the same well pad. See appendix C for well list. No truck unloading is currently planned.

6. Facilities Design

The proposed tanks will be constructed of steel in accordance to industry specifications. The design and construction of each bulk storage container will be compatible with the characteristics of the product it contains including temperature and pressure conditions. Piping between fixed above ground bulk storage tanks will be supported to minimize stress.

A 3' high metal containment will be constructed around the tank battery. A geomembrane liner shall be installed that extends and overlaps the steel wall containment maintaining continuous impermeable surface. A site perimeter berm approximately 2' high will be installed as well.

Please note: The proposed well is located on site with planned oil wells. The SWD facilities and the oil facilities are co-located within the same berms.

7. Spill Prevention and Monitoring Controls:

In addition to the previously mentioned secondary and tertiary containment (#7), the Operated facilities are equipped with 24-hour SCADA (Supervisory Control and Data Acquisition) remote monitoring systems. Onsite alarms are routed to the local PLC/HMI (Programmable Logic Controller/Human-Machine Interface), and then transmitted to SCADA. This setup enables real-time communication of potential issues at remote production facilities, significantly reducing detection time. The system alerts Operations personnel, allowing them to respond promptly and mitigate any concerns before they escalate into incidents. Below are some of the associated alarms:

- Tank alarms: Each tank is equipped with a high-level alarm. If the fluid level continues to rise, an additional alarm is triggered to close the Emergency Shut Down Valve (ESDV) on the facility's inlet streams, preventing more fluid from entering the tank.

- Separator alarms: Each treater is fitted with a high-level alarm. Should the level continue rising, a secondary alarm will initiate closure of the ESDV on the facility's inlet streams to halt additional fluid inflow.

- Additional SCADA monitoring includes: tubing pressure, vibration monitoring, and low- and high-flow alarms, among others.

In accordance with EPA regulations, a SPCC (Spill Prevention, Control, and Countermeasure) Plan will be implemented within six months of commissioning. The plan evaluates site-specific measures for spill prevention and control, and outlines documented response protocols. The Operator currently conducts regular SPCC inspections to ensure compliance with applicable regulations. Additionally, annual SPCC training is mandatory for all personnel handling oil.

8. Appendices

i. AOR Maps
ii. FW SAMPLE ANALYSIS
iii REPRESENTATIVE LOG
iv. WATER ANALYSIS (2 SOURCE WELLS)
v. DRILLING & COMPLETIONS PLAN
vi. WBD
vii. LIST OF OWNERS (Surface & Mineral) WITHIN 1/4 MILE
viii. AFFIDAVIT OF MAILING
ix. EXAMPLE OF LANDOWNER NOFITICATIONS (SURFACE & MINERAL)

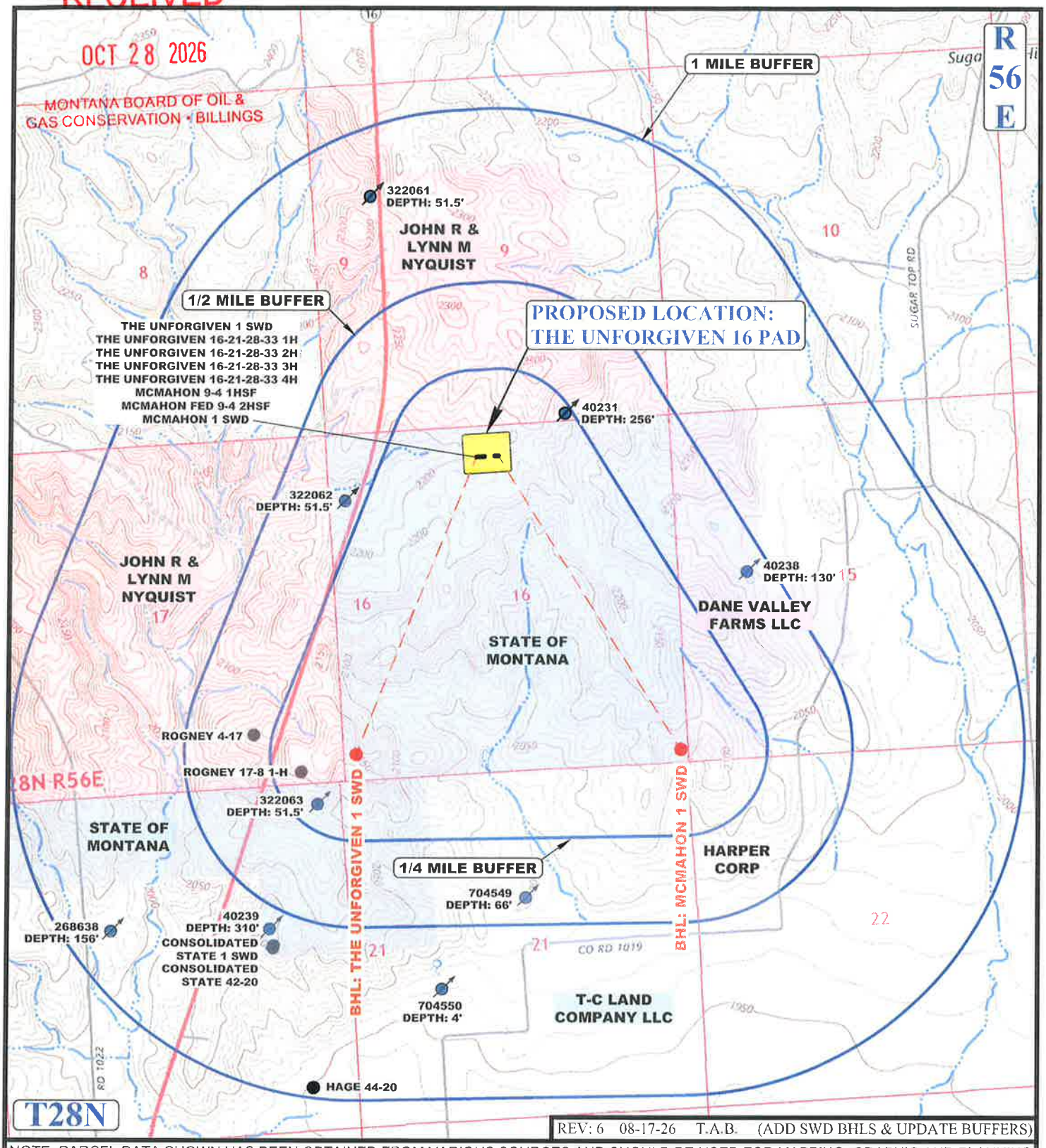
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Appendix I
AOR MAP
MCMAHON 1 SWD

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REV: 6 08-17-26 T.A.B. (ADD SWD BHLS & UPDATE BUFFERS)

NOTE: PARCEL DATA SHOWN HAS BEEN OBTAINED FROM VARIOUS SOURCES AND SHOULD BE USED FOR MAPPING, GRAPHIC AND PLANNING PURPOSES ONLY. NO WARRANTY IS MADE BY UINTAH ENGINEERING AND LAND SURVEYING (UELS) FOR ACCURACY OF THE PARCEL DATA.

LEGEND:

- OIL/GAS WELLS
- WATER WELLS

N

PHOENIX OPERATING LLC

THE UNFORGIVEN 16 PAD
NE 1/4 NW 1/4, SECTION 16, T28N, R56E, P.M.M.
ROOSEVELT COUNTY, MONTANA

SURVEYED BY	D.L., R.T.	07-08-26	SCALE
DRAWN BY	C.S.C.	11-12-25	1 : 24,000
WELL PROXIMITY MAP			TOPO C

UINTAH ENGINEERING & LAND SURVEYING
UELS, LLC
Corporate Office * 85 South 200 East
Vernal, UT 84078 * (435) 789-1017

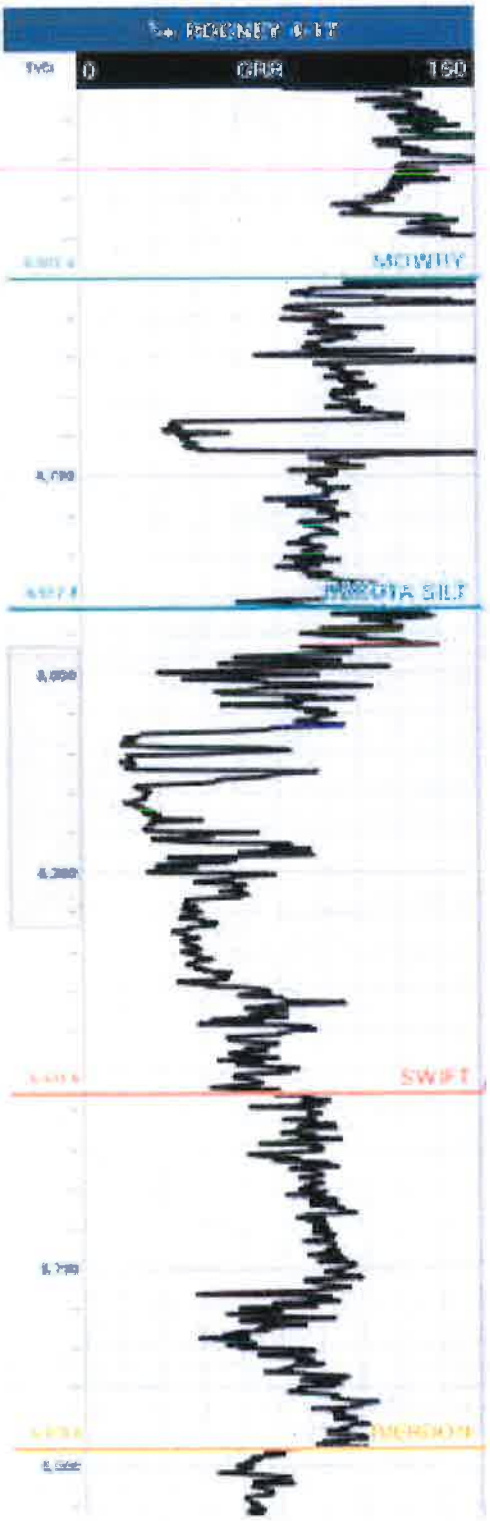
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Appendix III
REPRESENTATIVE LOG
MCMAHON 1 SWD

Well: Rogney 4-17
API: 25085213880000



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Appendix IV
WATER ANALYSIS
MCMAHON 1 SWD

See below for source well list. Phoenix Operating is currently permitting multiple wells on the same pad location as this proposed SWD. The Operator plans to only inject water from on pad wells. However, the sample included is representative of produced water in the area and was obtained from the nearby KATANA 1 SWD well.

File No:	Well Name:	Permit Status
TBD	THE UNFORGIVEN 16-21-28-.	Submitted
TBD	THE UNFORGIVEN 16-21-28-.	Submitted
TBD	THE UNFORGIVEN 16-21-28-.	Submitted
TBD	THE UNFORGIVEN 16-21-28-.	Submitted
TBD	MCMAHON 9-4 1HSF	Submitted
TBD	MCMAHON FED 9-4 2HSF	Submitted
TBD	THE UNFORGIVEN 1 SWD	Submitted

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Pace Analytical Services, LLC
1700 Elm Street
Minneapolis, MN 55414
(612)607-1700

July 31, 2026

Christina Jungels
Astro-Chem Lab, Inc.
4102 2nd Ave. W.
Williston, ND 58801

RE: Project: PHOENIX Operating Katana 1 SWD
Pace Project No.: 10781492

Dear Christina Jungels:

Enclosed are the analytical results for sample(s) received by the laboratory on July 24, 2026. The results relate only to the samples included in this report. Results reported herein conform to the applicable TNI/NELAC Standards and the laboratory's Quality Manual, where applicable, unless otherwise noted in the body of the report.

The test results provided in this final report were generated by each of the following laboratories within the Pace Network:

- Pace Analytical Services - Minneapolis

If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Andrea Richardson

Andrea Richardson
andrea.richardson@pacelabs.com
(218)341-6080
Project Manager

Enclosures

cc: Accounts Payable, Astro-Chem Lab, Inc.

REPORT OF LABORATORY ANALYSIS

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Section 4: Results 6
Section 5: Quality Control 7
Section 6: Qualifiers 15
Section 7: QC Cross Reference 16
Section 8: Chain of Custody 17
8.1: Chain of Custody 17

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Pace Analytical Services, LLC
1700 Elm Stree
Minneapolis, MN 5541
(612)607-170

CERTIFICATIONS

Project: PHOENIX Operating Katana 1 SWD
Pace Project No.: 10781492

Pace Analytical Services, LLC - Minneapolis MN
1700 Elm Street SE, Minneapolis, MN 55414
Alaska Contaminated Sites Certification #: 17-009
Arizona Certification #: AZ0014
Arkansas WW Certification #: 88-0680
Colorado Certification #: MN00064
DoD via A2LA Certification #: 2926.01
Florida Certification #: E87605
Idaho Certification #: MN00064
Indiana Certification #: C-MN-01
ISO/IEC 17025 via A2LA Certification #: 2926.01
Kentucky DW Certification #: 90062
Louisiana DEQ Certification #: AI-03086
Maine Certification #: MN00064
Michigan Certification #: 9909
Minnesota Dept of Ag Approval via Certification #: 027-053-137
Mississippi Certification #: MN00064
Montana Certification #: CERT0092
Nevada Certification #: MN00064
New Jersey Certification #: MN002
North Carolina DW Certification #: 27700
North Dakota Certification via A2LA #: R-036
Ohio DW Certification #: 41244
Oklahoma Certification #: 9507
Oregon Secondary Certification #: MN200001
Puerto Rico Certification #: MN00064
Tennessee Certification #: TN02818
Utah Certification #: MN00064
Virginia Certification #: 460163
West Virginia DEP Certification #: 382
Wisconsin Certification #: 999407970
USDA Permit #: P330-19-00208
Alabama Certification #: 40770
Alaska DW Certification #: MN00064
Arkansas DW Certification #: MN00064
California Certification #: 2929
Connecticut Certification #: PH-0256
EPA Region 8 Tribal Water Systems+Wyoming DW Certification #: via MN 027-053-137
Georgia Certification #: 959
Illinois Certification #: 200011
Iowa Certification #: 368
Kansas Certification #: E-10167
Kentucky WW Certification #: 90062
Louisiana DW Certification #: MN00064
Maryland Certification #: 322
Minnesota Certification #: 027-053-137
Minnesota Petrofund Registration #: 1240
Missouri Certification #: 10100
Nebraska Certification #: NE-OS-18-06
New Hampshire Certification #: 2081
New York Certification #: 11647
North Carolina WW Certification #: 530
North Dakota Certification via MN #: R-036
Ohio VAP Certification (1700) #: CL101
Oregon Primary Certification #: MN300001
Pennsylvania Certification #: 68-00563
South Carolina Certification #:74003001
Texas Certification #: T104704192
Vermont Certification #: VT-027053137
Washington Certification #: C486
West Virginia DW Certification #: 9952 C
Wyoming UST Certification via A2LA #: 2926.01

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Pace Analytical Services, LLC
1700 Elm Street
Minneapolis, MN 55414
(612)607-1700

N

SAMPLE SUMMARY

Project: PHOENIX Operating Katana 1 SWD
Pace Project No.: 10781492

Lab ID	Sample ID	Matrix	Date Collected	Date Received
10781492001	**Katana 1 SWD 4028**	Water	07/15/26 15:00	07/24/26 09:05

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(612)607-1700

SAMPLE ANALYTE COUNT

Project: PHOENIX Operating Katana 1 SWD
Pace Project No.: 10781492

Lab ID	Sample ID	Method	Analysts	Analytes Reported	Laboratory
10781492001	**Katana 1 SWD 4028**	EPA 6010D	IP	9	PASI-M
		SM 2320B	KEO	3	PASI-M
		SM 2540C	NRO	1	PASI-M
		SM 4500-H+B	KEO	1	PASI-M
		SM 2510	KEO	1	PASI-M
		ASTM D5057	NRO	1	PASI-M
		EPA 300.0	AR3	2	PASI-M
		EPA 353.2	JFP	1	PASI-M

PASI-M = Pace Analytical Services - Minneapolis

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ANALYTICAL RESULTS

Project: PHOENIX Operating Katana 1 SWD
Pace Project No.: 10781492

Sample: Katana 1 SWD 4028 **Lab ID: 10781492001** Collected: 07/15/26 15:00 Received: 07/24/26 09:05 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
6010D MET ICP	Analytical Method: EPA 6010D Preparation Method: EPA 3010A Pace Analytical Services - Minneapolis							
Barium	**1430**	ug/L	50.0	5	07/27/26 05:45	07/27/26 16:35	7440-39-3	
Calcium	**1680000**	ug/L	2500	5	07/27/26 05:45	07/27/26 16:35	7440-70-2	
Chromium	ND	ug/L	50.0	5	07/27/26 05:45	07/27/26 16:35	7440-47-3	D3
Iron	**3470**	ug/L	250	5	07/27/26 05:45	07/27/26 16:35	7439-89-6	
Magnesium	**101000**	ug/L	2500	5	07/27/26 05:45	07/27/26 16:35	7439-95-4	
Potassium	**921000**	ug/L	25000	10	07/27/26 05:45	07/27/26 16:47	7440-09-7	
Sodium	**11300000**	ug/L	100000	100	07/27/26 05:45	07/27/26 16:50	7440-23-5	
Strontium	**125000**	ug/L	500	100	07/27/26 05:45	07/27/26 16:50	7440-24-6	
Zinc	**116**	ug/L	100	5	07/27/26 05:45	07/27/26 16:35	7440-66-6	
2320B Alkalinity	Analytical Method: SM 2320B Pace Analytical Services - Minneapolis							
Alkalinity, Total as CaCO3	**476**	mg/L	5.0	1		07/28/26 13:18		
Alkalinity,Bicarbonate (CaCO3)	**476**	mg/L	5.0	1		07/28/26 13:18		
Alkalinity,Carbonate (CaCO3)	ND	mg/L	5.0	1		07/28/26 13:18		
2540C Total Dissolved Solids	Analytical Method: SM 2540C Pace Analytical Services - Minneapolis							
Total Dissolved Solids	**39000**	mg/L	2500	1		07/25/26 13:48		1M,H3
4500H+ pH, Electrometric	Analytical Method: SM 4500-H+B Pace Analytical Services - Minneapolis							
pH at 25 Degrees C	**7.1**	Std. Units	0.10	1		07/29/26 10:22		H6
SM2510 Specific Conductance	Analytical Method: SM 2510 Pace Analytical Services - Minneapolis							
Specific Conductance	**74000**	umhos/cm	5.0	1		07/28/26 10:12		
Specific Gravity	Analytical Method: ASTM D5057 Pace Analytical Services - Minneapolis							
Specific Gravity	**1.03**			1		07/31/26 15:55		N2
300.0 IC Anions	Analytical Method: EPA 300.0 Pace Analytical Services - Minneapolis							
Chloride	**23900**	mg/L	144	120		07/27/26 00:05	16887-00-6	
Sulfate	**728**	mg/L	60.0	50		07/25/26 03:29	14808-79-8	D3
353.2 Nitrate + Nitrite	Analytical Method: EPA 353.2 Pace Analytical Services - Minneapolis							
Nitrogen, NO2 plus NO3	ND	mg/L	0.10	1		07/26/26 10:02		

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QUALITY CONTROL DATA

Project: PHOENIX Operating Katana 1 SWD
Pace Project No.: 10781492

QC Batch: 1077452
QC Batch Method: EPA 3010A
Analysis Method: EPA 6010D
Analysis Description: 6010D Water
Laboratory: Pace Analytical Services - Minneapolis

Associated Lab Samples: 10781492001

5

METHOD BLANK: 5599362 Matrix: Water

Associated Lab Samples: 10781492001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Barium	ug/L	ND	10.0	07/27/26 16:12	
Calcium	ug/L	ND	500	07/27/26 16:12	
Chromium	ug/L	ND	10.0	07/27/26 16:12	
Iron	ug/L	ND	50.0	07/27/26 16:12	
Magnesium	ug/L	ND	500	07/27/26 16:12	
Potassium	ug/L	ND	2500	07/27/26 16:12	
Sodium	ug/L	ND	1000	07/27/26 16:12	
Strontium	ug/L	ND	5.0	07/27/26 16:12	
Zinc	ug/L	ND	20.0	07/27/26 16:12	

LABORATORY CONTROL SAMPLE: 5599363

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Barium	ug/L	1000	1050	105	80-120	
Calcium	ug/L	20000	19500	98	80-120	
Chromium	ug/L	1000	1030	103	80-120	
Iron	ug/L	20000	20800	104	80-120	
Magnesium	ug/L	20000	20400	102	80-120	
Potassium	ug/L	20000	20400	102	80-120	
Sodium	ug/L	20000	20400	102	80-120	
Strontium	ug/L	1000	1050	105	80-120	
Zinc	ug/L	1000	990	99	80-120	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 5599364 5599365

Parameter	Units	10781558001 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qualifiers
Barium	ug/L	647	1000	1000	1690	1710	104	106	75-125	1	20	
Calcium	ug/l	64500	20000	20000	83500	83700	95	96	75-125	0	20	
Chromium	ug/L	499	1000	1000	1510	1530	101	103	75-125	1	20	
Iron	ug/L	12900	20000	20000	33100	32900	101	100	75-125	0	20	
Magnesium	ug/L	12300	20000	20000	33600	34100	107	109	75-125	1	20	
Potassium	ug/L	182000	20000	20000	209000	218000	132	179	75-125	4	20	P6
Sodium	ug/L	53800	20000	20000	73600	73800	99	100	75-125	0	20	
Strontium	ug/L	161	1000	1000	1180	1210	102	104	75-125	2	20	
Zinc	ug/L	1060	1000	1000	1980	1990	92	93	75-125	0	20	

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.

REPORT OF LABORATORY ANALYSIS

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MONTANA BOARD OF OIL &
GAS CONSERVATION - BILLINGS

Pace Analytical Services, LLC
1700 Elm Street
Minneapolis, MN 55414
(612)607-1700

QUALITY CONTROL DATA

Project: PHOENIX Operating Katana 1 SWD
Pace Project No.: 10781492

QC Batch: 1077781
QC Batch Method: SM 2320B
Analysis Method: SM 2320B
Analysis Description: 2320B Alkalinity
Laboratory: Pace Analytical Services - Minneapolis

Associated Lab Samples: 10781492001

METHOD BLANK: 5600831
Matrix: Water

Associated Lab Samples: 10781492001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Alkalinity, Total as CaCO3	mg/L	ND	5.0	07/28/26 11:02	
Alkalinity,Bicarbonate (CaCO3)	mg/L	ND	5.0	07/28/26 11:02	N2
Alkalinity,Carbonate (CaCO3)	mg/L	ND	5.0	07/28/26 11:02	N2

LABORATORY CONTROL SAMPLE & LCSD: 5600832 5600833

Parameter	Units	Spike Conc.	LCS Result	LCSD Result	LCS % Rec	LCSD % Rec	% Rec Limits	RPD	Max RPD	Qualifiers
Alkalinity, Total as CaCO3	mg/L	40	40.8	41.0	102	103	90-110	1	20	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 5600834 5600835

Parameter	Units	10781428001 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qualifiers
Alkalinity, Total as CaCO3	mg/L	149	40	40	190	185	103	90	80-120	3	20	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 5600836 5600837

Parameter	Units	10781428002 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qualifiers
Alkalinity, Total as CaCO3	mg/L	165	40	40	204	210	96	111	80-120	3	20	

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QUALITY CONTROL DATA

Project: PHOENIX Operating Katana 1 SWD
Pace Project No.: 10781492

QC Batch: 1077401
QC Batch Method: SM 2540C
Analysis Method: SM 2540C
Analysis Description: 2540C Total Dissolved Solids
Laboratory: Pace Analytical Services - Minneapolis

Associated Lab Samples: 10781492001

5

METHOD BLANK: 5598971 Matrix: Water
Associated Lab Samples: 10781492001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Total Dissolved Solids	mg/L	ND	25.0	07/25/26 13:45	

LABORATORY CONTROL SAMPLE: 5598972

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Total Dissolved Solids	mg/L	1000	1000	100	80-120	

SAMPLE DUPLICATE: 5598973

Parameter	Units	10780903001 Result	Dup Result	RPD	Max RPD	Qualifiers
Total Dissolved Solids	mg/L	ND	14J		10	PL

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QUALITY CONTROL DATA

Project: PHOENIX Operating Katana 1 SWD
Pace Project No.: 10781492

QC Batch: 1078078
QC Batch Method: SM 4500-H+B

Analysis Method: SM 4500-H+B
Analysis Description: 4500H+B pH
Laboratory: Pace Analytical Services - Minneapolis

Associated Lab Samples: 10781492001

5

LABORATORY CONTROL SAMPLE: 5602116

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
pH at 25 Degrees C	Std. Units	5	5.0	101	98-102	H6

SAMPLE DUPLICATE: 5602117

Parameter	Units	10781284002 Result	Dup Result	RPD	Max RPD	Qualifiers
pH at 25 Degrees C	Std. Units	7.1	7.1	0	3	H6

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QUALITY CONTROL DATA

Project: PHOENIX Operating Katana 1 SWD
Pace Project No.: 10781492

QC Batch: 1077743
QC Batch Method: SM 2510
Analysis Method: SM 2510
Analysis Description: SM2510 Specific Conductance
Laboratory: Pace Analytical Services - Minneapolis

Associated Lab Samples: 10781492001

5

METHOD BLANK: 5600747 Matrix: Water

Associated Lab Samples: 10781492001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Specific Conductance	umhos/cm	ND	5.0	07/28/26 09:51	

LABORATORY CONTROL SAMPLE: 5600748

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Specific Conductance	umhos/cm	1000	1050	105	90-110	

SAMPLE DUPLICATE: 5600749

Parameter	Units	10781180001 Result	Dup Result	RPD	Max RPD	Qualifiers
Specific Conductance	umhos/cm	16400	16600	1	20	

SAMPLE DUPLICATE: 5600750

Parameter	Units	10781180002 Result	Dup Result	RPD	Max RPD	Qualifiers
Specific Conductance	umhos/cm	2010	2120	5	20	

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QUALITY CONTROL DATA

Project: PHOENIX Operating Katana 1 SWD
Pace Project No.: 10781492

QC Batch: 1078699
QC Batch Method: ASTM D5057
Analysis Method: ASTM D5057
Analysis Description: Spec.Gravity/ASTM D5057
Laboratory: Pace Analytical Services - Minneapolis

Associated Lab Samples: 10781492001

5

SAMPLE DUPLICATE: 5605427

Parameter	Units	10781299001 Result	Dup Result	RPD	Max RPD	Qualifiers
Specific Gravity		1.01	1.01	0	20	N2

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QUALITY CONTROL DATA

Project: PHOENIX Operating Katana 1 SWD
Pace Project No.: 10781492

QC Batch: 1077377
QC Batch Method: EPA 300.0
Analysis Method: EPA 300.0
Analysis Description: 300.0 IC Anions
Laboratory: Pace Analytical Services - Minneapolis

Associated Lab Samples: 10781492001

5

METHOD BLANK: 5598554 Matrix: Water

Associated Lab Samples: 10781492001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Chloride	mg/L	ND	1.2	07/25/26 01:40	
Sulfate	mg/L	ND	1.2	07/25/26 01:40	

LABORATORY CONTROL SAMPLE: 5598555

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Chloride	mg/L	200	199	99	90-110	
Sulfate	mg/L	200	199	99	90-110	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 5598556 5598557

Parameter	Units	10780812001 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qualifiers
Chloride	mg/L	6.7	200	200	212	211	103	102	80-120	0	20	
Sulfate	mg/L	102	200	200	298	298	98	98	80-120	0	20	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 5598558 5598559

Parameter	Units	10780973002 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qualifiers
Chloride	mg/L	442	400	400	840	840	100	99	80-120	0	20	E
Sulfate	mg/L	23.8	400	400	429	428	101	101	80-120	0	20	

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QUALITY CONTROL DATA

Project: PHOENIX Operating Katana 1 SWD
Pace Project No.: 10781492

QC Batch: 1077416
QC Batch Method: EPA 353.2
Analysis Method: EPA 353.2
Analysis Description: 353.2 Nitrate + Nitrite, preserved
Laboratory: Pace Analytical Services - Minneapolis

Associated Lab Samples: 10781492001

5

METHOD BLANK: 5599200 Matrix: Water

Associated Lab Samples: 10781492001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Nitrogen, NO2 plus NO3	mg/L	ND	0.10	07/26/26 09:50	

LABORATORY CONTROL SAMPLE: 5599201

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Nitrogen, NO2 plus NO3	mg/L	1	0.99	99	90-110	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 5599202 5599203

Parameter	Units	10781017001 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qualifiers
Nitrogen, NO2 plus NO3	mg/L	0.71	1	1	1.7	1.7	95	95	90-110	0	20	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 5599204 5599205

Parameter	Units	10781017006 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qualifiers
Nitrogen, NO2 plus NO3	mg/L	1.5	1	1	2.4	2.4	93	95	90-110	1	20	

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1700 Elm Street
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QUALIFIERS

Project: PHOENIX Operating Katana 1 SWD
Pace Project No.: 10781492

DEFINITIONS

DF - Dilution Factor, if reported, represents the factor applied to the reported data due to dilution of the sample aliquot.
ND - Not Detected at or above adjusted reporting limit.
TNTC - Too Numerous To Count
J - Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.
MDL - Adjusted Method Detection Limit.
PQL - Practical Quantitation Limit.
RL - Reporting Limit - The lowest concentration value that meets project requirements for quantitative data with known precision and bias for a specific analyte in a specific matrix.
S - Surrogate
1,2-Diphenylhydrazine decomposes to and cannot be separated from Azobenzene using Method 8270. The result for each analyte is a combined concentration.
Consistent with EPA guidelines, unrounded data are displayed and have been used to calculate % recovery and RPD values.
LCS(D) - Laboratory Control Sample (Duplicate)
MS(D) - Matrix Spike (Duplicate)
DUP - Sample Duplicate
RPD - Relative Percent Difference
NC - Not Calculable.
SG - Silica Gel - Clean-Up
U - Indicates the compound was analyzed for, but not detected.
N-Nitrosodiphenylamine decomposes and cannot be separated from Diphenylamine using Method 8270. The result reported for each analyte is a combined concentration.
Reported results are not rounded until the final step prior to reporting. Therefore, calculated parameters that are typically reported as "Total" may vary slightly from the sum of the reported component parameters.
Pace Analytical is TNI accredited. Contact your Pace PM for the current list of accredited analytes.
TNI - The NELAC Institute.

ANALYTE QUALIFIERS

1M	Constant weight was not achieved after four drying cycles. The residue exhibited a final weight change of >0.5 mg.
D3	Sample was diluted due to the presence of high levels of non-target analytes or other matrix interference.
E	Analyte concentration exceeded the calibration range. The reported result is estimated.
H3	Sample was received or analysis requested beyond the recognized method holding time.
H6	Analysis initiated outside of the 15 minute EPA required holding time.
N2	The lab does not hold NELAC/TNI accreditation for this parameter but other accreditations/certifications may apply. A complete list of accreditations/certifications is available upon request.
P6	Matrix spike recovery was outside laboratory control limits due to a parent sample concentration notably higher than the spike level.
PL	The minimum mass of dried residue of 2.5 mg could not be obtained using the routine sample volume of 100 mL.

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Minneapolis, MN 55414
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QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: PHOENIX Operating Katana 1 SWD
Pace Project No.: 10781492

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
10781492001	**Katana 1 SWD 4028**	EPA 3010A	1077452	EPA 6010D	1077596
10781492001	**Katana 1 SWD 4028**	SM 2320B	1077781		
10781492001	**Katana 1 SWD 4028**	SM 2540C	1077401		
10781492001	**Katana 1 SWD 4028**	SM 4500-H+B	1078078		
10781492001	**Katana 1 SWD 4028**	SM 2510	1077743		
10781492001	**Katana 1 SWD 4028**	ASTM D5057	1078699		
10781492001	**Katana 1 SWD 4028**	EPA 300.0	1077377		
10781492001	**Katana 1 SWD 4028**	EPA 353.2	1077416		

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ASTRO-CHEM LAB, INC.
4102 2nd Ave. W.
P.O. Box 972
Williston, ND 58801
701-572-7355
www.astrochemlab.com

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CHAIN of CUSTODY

Page 1 of 1

Client: Phoenix Operating, LLC
Project Manager:
Project Name: Katana 1 SWD
RUSH (Pre-approval required)
[ ] 3-4 DAY [ ] 5 DAY [ ] 7 DAY

Telephone No. | Fax No.

Method of Shipment: FEDEX PRIORITY OVERNIGHT

Special Detection Limit/Reporting

*Container Size: 3 | 1 | 3
*Container Preservative: 2 | 1 | 3

*Container Size: (1) 1L, (2) 500ml, (3) 250ml (4) 125ml (5) 100ml (6) 40ml vial, (7) EnCore, (8) TerraCore, (9) 90ml, (10) Other

**Preservative Types: (1) None (2) HNO3 (3) H2SO4 (4) HCl (5) NaOH (6) Zn Acetate (7) NaHSO4 (8) Sod. Thiosulfate (9) Ascorbic Acid (10) MeOH (11) Other

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Customer Sample I.D.	Lab Sample No.	No. of Containers	Matrix: Soil	Water	Air	Other	Sampling Date	Sampling Time	Analysis Requested: 6010D: Total Metals: Ba,Ca,Cr,Fe,Mg,K,Na,Sr,Zn	Alkalinity (Carbonate & Bicarbonate), Cl, SO4, pH, Conductivity, Specific Gravity, Total Dissolved Solids	353.2 Nitrate+Nitrite	Turn Around Time (working days)
Katana 1 SWD	4028	3		X			7-15-26	3:00 pm	X	X	X	8

8.1

Rush 5 day

REMARKS: 001

astrochem@mldconetwork.com
www.astrochemlab.com

WO#: 10781492
10781492

Sample Received Intact: Yes No
Temperature received: Ice No ice

Collected By: (Printed Name & Phone #) Adam Lambert

Collected By: (Signature) Adam Lambert

Relinquished By: Adam Lambert — Date 7/22/26 Time 5:00 pm — Received By: Dustin Mantle

Relinquished By: Dustin Mantle — Date 7/23/26 Time 9:41 AM — Received By: Brenda Bertha (ACL)

Relinquished By: — Date — Time — Received By: — Date 7/24/26 Time 905

Lab Work No.

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Methods for Analysis (ACL OIL WATER GUIDELINES)

Alkalinity (2320B)
- Alkalinity, Bicarbonate (CaCO3)
- Alkalinity, Carbonate (CaCO3)
- Alkalinity, Total as CaCO3

Nitrate + Nitrite (353.2)
- Nitrogen, NO2 plus NO3

pH, Electrometric (4500H+B)

8 Metals-Barium, Chromium, Iron, Zinc, Calcium, Magnesium, Sodium, Potassium (6010D MET ICP)

Chloride & Sulfate (300.0 IC Anions)

Specific Conductance (SM2510)

Specific Gravity (ASTM D5057)

Strontium (6020B MET ICPMS)

Total Dissolved Solids (2540C)

8.1

8

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ENV-FRM-MIN4-0150 v21_Sample Condition Upon Receipt

Person Examining & Date: DGS 7/24/26 **PROJECT #:**

WO#: 10781492
PM: AR4 Due Date: 07/31/26
CLIENT: 11 Astro Che

Client Name: Astro-Chem Lab

Custody Seal Present: ☐ YES ☑ NO **Seals Intact:** ☐ YES ☑ NO

Tracking Number: 8747 8933 2696 ☐ See Exceptions form ENV-FRM-MIN4-0142.

Courier: ☐ Client ☐ Commercial ☑ FedEx ☐ Pace Courier/Field ☐ SpeeDee ☐ UPS ☐ USPS

Packing Material: ☐ Bubble Bags ☑ Bubble Wrap ☐ None ☐ Other: _____ **Biological Tissue Frozen:** ☐ YES ☐ NO

Thermometer: ☑ T1 (0461) ☐ T2 (0431) ☐ T3 (0459) ☐ T4 (0402) ☐ T5 (0187) ☐ T6 (0396) ☐ T7 (0377) ☐ T8 (0775) ☐ T9 (0428) ☐ 01339252 (0710)
Type of Ice: ☐ Blue ☐ Dry ☑ Wet ☐ Melted ☐ None
Temp Blank: ☑ YES ☐ NO

NOTE: Temp should be ≤ 6°C, but above freezing.
Read Temp w/Temp Blank: 2.9 °C
Correction Factor: -0.2
Corrected Temp w/Temp Blank: 2.7 °C

Did Samples Originate in West Virginia: ☐ YES ☑ NO (list temps on exception)
Were All Container Temps Taken: ☐ YES ☐ NO ☑ N/A
Average Corrected Temp (No Temp Blank Only): _____
☐ See Exceptions form ENV-FRM-MIN4-0142. ☐ 1 Container

USDA Regulated Soil: ☑ N/A – Water Sample/Other (describe): _____
Did Samples originate from one of the following states (check maps): ☐ YES ☐ NO
Circle State: AL, AR, CA, FL, GA, ID, LA, MS, NC, NM, NY, OK, OR, SC, TN, TX, VA
Are samples from a foreign source (international, including Hawaii and Puerto Rico): ☐ YES ☐ NO

NOTE: If YES to either question, fill out a Regulated Soil Checklist (ENV-FRM-MIN4-0154) and include with SCUR/COC paperwork.

LOCATION (check one): ☐ DULUTH ☑ MINNEAPOLIS ☐ VIRGINIA	YES	NO	N/A	COMMENT(S)
Chain of Custody Present and Filled Out? (i.e., Analysis/ID/Date/Time)	☑	☐		1.
Chain of Custody Relinquished?	☑	☐		2.
Sampler Name and/or Signature on COC?	☑	☐	☐	3.
Samples Arrived within Hold Time? NOTE: < 24 hrs if lab filter is requested for Dissolved LL-Mercury by 1631E.	☑	☐		4. If Fecal: ☐ < 8 hrs ☐ > 8 hr but < 24 hrs ☐ >24 hr
Short Hold Time Analysis (<72 hr)?	☐	☑		5. ☐ BOD / cBOD ☐ Fecal coliform ☐ Hex Chrom ☐ HPC ☐ Nitrate ☐ Nitrite ☐ Ortho Phos ☐ Total coliform/*E. coli* ☐ Turbidity ☐ Other:
Rush Turn Around Time Requested?	☑	☐		6. ☐ Same Day ☐ 1 Day ☐ 2 Day ☐ 3 Day ☑ 5 Day Due Date:
Sufficient Sample Volume? (If NO, list approximate volume in section 7.)	☑	☐		7.
Correct Containers Used? – Pace Containers Used?	☑ ☑	☐ ☐	☐	8.
Containers Intact?	☑	☐		9.
Field Filtered Volume Received for Dissolved Tests?	☐	☑	☐	10. Is sediment visible in the dissolved container: ☐ YES ☐ NO
ID/Date/Time Match? (If NO, fill out section 11.) Matrix: ☐ Oil ☐ Soil ☑ Water ☐ Other	☑	☐	☐	11. ☐ See Exceptions form ENV-FRM-MIN4-0142
All containers needing acid/base preservation have been checked?	☑	☐	☐	12.
Preserved containers in compliance with EPA recommendations? (HNO3, H2SO4, < 2 pH, NaOH > 9 Sulfide, NaOH > 10 Cyanide) EXCEPTIONS (water only): VOA, Coliform, TOC/DOC, Oil & Grease, Phenols, DRO/8015, Dioxins, and PFAS	☐ ☐	☐ ☐	☐ ☑	☐ See Exceptions form ENV-FRM-MIN4-0142
Extra labels present on soil VOA or WIDRO containers? (soil only)	☐	☐	☑	13.
Headspace in Methyl Mercury Container?	☐	☐	☑	14.
Headspace in VOA Vials (greater than 6mm)?	☐	☐	☑	☐ See Exceptions form ENV-FRM-MIN4-0140
Trip Blanks Present?	☐	☐	☑	15.
Trip Blank Custody Seals Present?	☐	☐	☑	Pace Trip Blank Lot # (If purchased):

Sample #:
☑ HNO3 001: 1/1 ☑ H2SO4 001: 1/1 ☐ NaOH _____ ☐ Zinc Acetate _____

pH Paper Lot #:
☐ Residual Chlorine _____ ☑ 0-6 Roll 229725 ☐ 0-6 Strip _____ ☐ 0-14 Strip _____
Positive for Residual Chlorine (NaOH containers only): ☐ YES ☐ NO

CLIENT NOTIFICATION / RESOLUTION: **Labeled By:** DGS **Line:** 2

Person Contacted & Date/Time: _____ **PM Review & Date:** Anchea Richardson 7/24/26

***NOTE:** When there is a discrepancy affecting North Carolina compliance samples, a copy of this form will be sent to the North Carolina DEQ Certification Office.*

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Appendix VII
LAND OWNERSHIP WITHIN 1/4 MILE AOR
MCMAHON 1 SWD

List of Owners (Surface & Operator) Within 1/4 Mile

Operator(s):

Kraken Oil & Gas, LLC
(Operator w/AOR)
9805 Katy Freeway Ste 300
Houston, TX 77024

Surface Owner(s):

Jolm R. Nyquist and Lynn M. Nyquist
5814 ROAD 1003
BAINVILLE, MT 59212

L & L LAND & LIVESTOCK LLC
1752 ROAD 2058
CULBERTSON, MT 59218

DANE VALLEY FARMS LLC
1838 ROAD 2058
CULBERTSON, MT 59218

STATE OF MONTANA-STATE LANDS
8001 N MONTANA AVE
HELENA, MT 59601

T-C LAND COMPANY LLC
1218 ROAD 2060
BAINVILLE, MT 59212

HARPER CORP
MAIL TO JANE H ECKEL
1610 N PROSPECT A VE # 1005
MILWAUKEE, WI 53202

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Appendix VIII
AFFIDAVIT OF MAILING
MCMAHON 1 SWD

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AFFIDAVIT OF MAILING

STATE OF COLORADO §
§
COUNTY OF DENVER §

The undersigned, Paula Frisbee, of lawful age, first duly sworn on her oath states that she is a duly authorized agent of Phoenix Operating LLC, does hereby certify that she has sent (via certified mail) a Notice of Application for Fluid Injection to the surface and lease owners within a radius of ¼ mile from the location of proposed THE UNFORGIVEN 1 SWD well and MCMAHON 1 SWD well, NE1/4NW1/4 of Section 16, Township 28 North, Range 56 East, Roosevelt County, MT.
The following contains the address and legal description of the landownership for lease owners.

Lease Owner:	Legal Description:
Kraken Oil & Gas, LLC 9805 Katy Freeway Suite 300 Houston, TX 77024	Sec. 21: T28N-R56E Roosevelt County, MT
Purified Resource Partners, LLC P.O. Box 77 Sidney, MT 59270	Sec. 21: T28N-R56E Roosevelt County, MT
United States of America 5001 Southgate Drive Billings, MT 59101	Sec. 9: T28N-R56E Roosevelt County, MT

By: _____ Dated: 10-26-2026
Paula Frisbee, Director of Land and Administration
Phoenix Operating LLC

ACKNOWLEDGMENT

STATE OF COLORADO §
§
COUNTY OF DENVER §

On this 26th day of October 2026 before me, a Notary Public, personally appeared Paula Frisbee, Director of Land and Administration known to me to be the person whose name is subscribed to the foregoing instrument as an agent of Phoenix Operating LLC and acknowledged to me that she executed the same as her free act and deed for the purposes therein expressed, in the capacity stated, and as the act and deed of said company.

(Seal)

STEPHANIE SPURLOCK
Notary Public
State of Colorado
Notary ID # 20144012200
My Commission Expires 04-23-2030

_____
Notary Public

My Commission Expires: 4/23/2030

RECEIVED

OCT 28 2026

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

AFFIDAVIT OF MAILING

STATE OF COLORADO §
§
COUNTY OF DENVER §

The undersigned, Paula Frisbee, of lawful age, first duly sworn on her oath states that she is a duly authorized agent of Phoenix Operating LLC, does hereby certify that she has sent (via certified mail) a Notice of Application for Fluid Injection to the surface owners within a radius of ¼ mile from the location of proposed THE UNFORGIVEN 1 SWD well and MCMAHON 1 SWD well, NE1/4NW1/4 of Section 16, Township 28 North, Range 56 East, Roosevelt County, MT.
The following contains the address and legal description of landownership for surface owners.

Surface Owner:	Legal Description:
John R. Nyquist and Lynn M. Nyquist 5814 ROAD 1003 BAINVILLE, MT 59212	Sec. 8, 9, and 17: T28N-R56E Roosevelt County, MT
L & L LAND & LIVESTOCK LLC 1752 ROAD 2058 CULBERTSON, MT 59218	Sec. 10: T28N-R56E Roosevelt County, MT
DANE VALLEY FARMS LLC 1838 ROAD 2058 CULBERTSON, MT 59218	Sec. 15: T28N-R56E Roosevelt County, MT
STATE OF MONTANA-STATE LANDS 8001 N MONTANA AVE HELENA, MT 59601	Sec. 16, 20, and 21: T28N-R56E Roosevelt County, MT
T-C LAND COMPANY LLC 1218 ROAD 2060 BAINVILLE, MT 59212	Sec. 21: T28N-R56E Roosevelt County, MT
HARPER CORP MAIL TO JANE H ECKEL 1610 N PROSPECT AVE #1005 MILWAUKEE, WI 53202	Sec. 22: T28N-R56E Roosevelt County, MT

RECEIVED

OCT 28 2026

MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

By: _____ Dated: 10-26-2026
Paula Frisbee, Director of Land and Administration
Phoenix Operating LLC

ACKNOWLEDGMENT

STATE OF COLORADO §
§
COUNTY OF DENVER §

On this 30th day of June, 2026 before me, a Notary Public, personally appeared Paula Frisbee, Director of Land and Administration, known to me to be the person whose name is subscribed to the foregoing instrument as an agent of Phoenix Operating LLC and acknowledged to me that she executed the same as her free act and deed for the purposes therein expressed, in the capacity stated, and as the act and deed of said company.

(Seal)

STEPHANIE SPURLOCK
Notary Public
State of Colorado
Notary ID # 20144012200
My Commission Expires 04-23-2030

_____
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Appendix IX
LANDOWNER NOTIFICATION LETTERS
MCMAHON 1 SWD

Examples of Landowner Notification Letters (Surface & Lease Owners)

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MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

October 27, 2026

To: Surface Owner
Address
City, State, Zip

From: Phoenix Operating LLC
4643 South Ulster Street Suite 1510
Denver, Colorado 80237

Re: Proposed Private Saltwater Disposal Well – THE UNFORGIVEN 1 SWD
Surface Hole: 462' FNL & 2305' FWL, NENW
Section 16, Township 28 North, Range 56 East, Roosevelt County, MT
Bottom Hole: 400' FSL & 200' FWL, Lot 4
Section 16, Township 28 North, Range 56 East, Roosevelt County, MT

Proposed Private Saltwater Disposal Well – MCMAHON 1 SWD
Surface Hole: 462' FNL & 2635' FWL, NENW
Section 16, Township 28 North, Range 56 East, Roosevelt County, MT
Bottom Hole: 195' FSL & 100' FEL, Lot 1
Section 16, Township 28 North, Range 56 East, Roosevelt County, MT

This letter is to advise you that Phoenix Operating LLC (Phoenix) plans to drill and complete the subject well into a Class II saltwater disposal well. Water will be injected into the Dakota group for the purpose of disposal operations.

In accordance with the rules and regulations of the Montana Board of Oil & Gas Conservation (MBOG), Phoenix is required to give notice that it has made an application to perform this work to each surface owner within a one-quarter mile radius of the injection site. The MBOGC will conduct a hearing regarding this application. For the hearing date, please contact the MBOGC by phone at (406) 656-0040, or visit their website at https://dnrc.mt.gov/BOGC/. Your comments or objections regarding this application may be directed to the MBOGC at that time.

Written comments or objections may be submitted prior to the hearing to the following address:

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

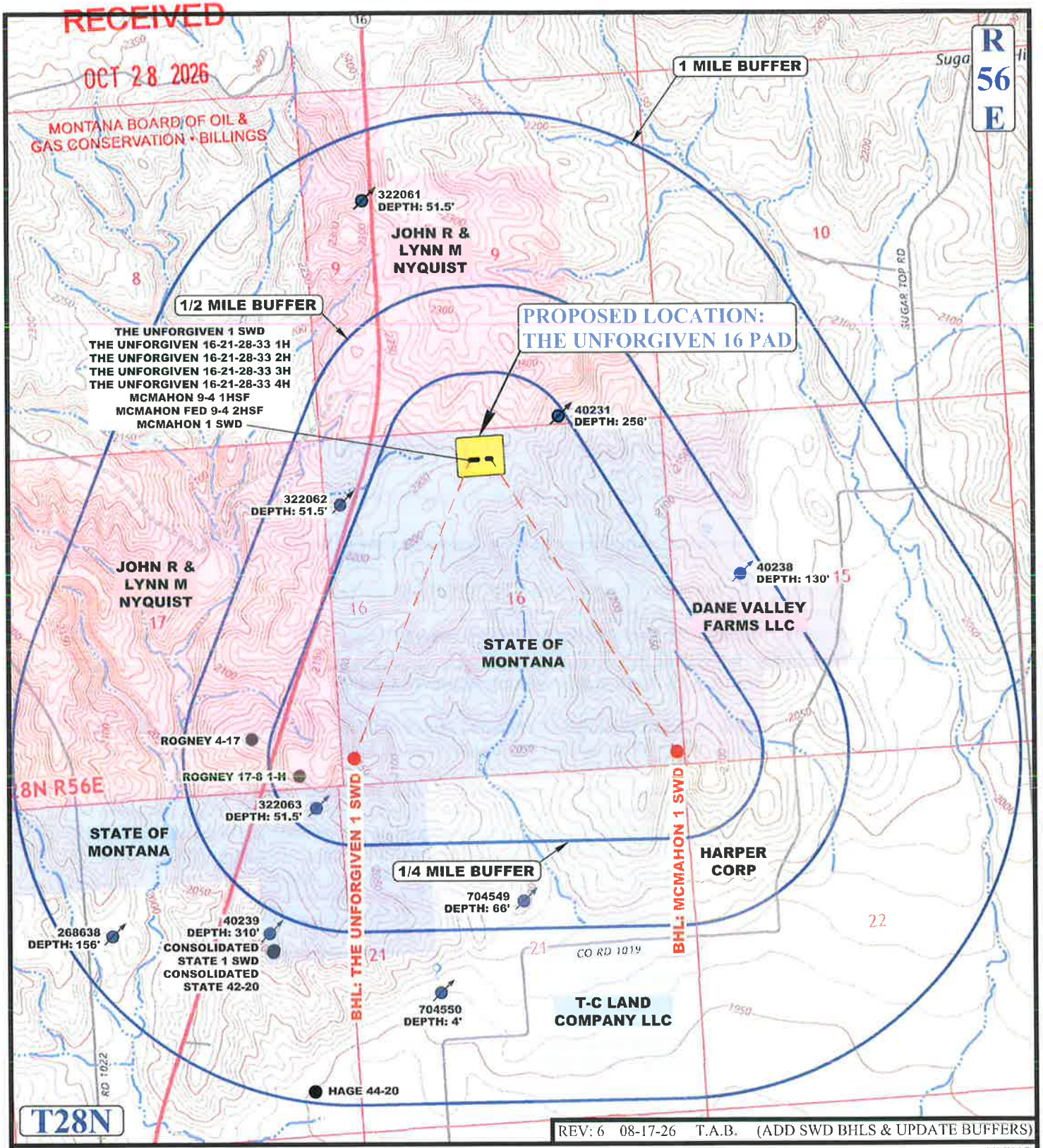
Please direct any and all of your communication regarding this proposed project, including more information about the upcoming hearing, to Mr. John Gizicki with the MBOGC at (406) 656-0040 or to me with Phoenix Operating LLC at (701) 770-8484.

Respectfully,

Ashleigh Borud

Ashleigh Borud
Surface Land Manager – Phoenix Operating LLC
aborud@phoenixenergy.com

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REV: 6 08-17-26 T.A.B. (ADD SWD BHLS & UPDATE BUFFERS)

NOTE: PARCEL DATA SHOWN HAS BEEN OBTAINED FROM VARIOUS SOURCES AND SHOULD BE USED FOR MAPPING, GRAPHIC AND PLANNING PURPOSES ONLY. NO WARRANTY IS MADE BY UINTAH ENGINEERING AND LAND SURVEYING (UELS) FOR ACCURACY OF THE PARCEL DATA.

LEGEND:

- OIL/GAS WELLS
- WATER WELLS

N

PHOENIX OPERATING LLC

THE UNFORGIVEN 16 PAD
NE 1/4 NW 1/4, SECTION 16, T28N, R56E, P.M.M.
ROOSEVELT COUNTY, MONTANA

SURVEYED BY	D.L., R.T.	07-08-26	SCALE
DRAWN BY	C.S.C.	11-12-25	1 : 24,000

WELL PROXIMITY MAP | **TOPO C**

UINTAH ENGINEERING & LAND SURVEYING
UELS, LLC
Corporate Office * 85 South 200 East
Vernal, UT 84078 * (435) 789-1017

PHOENIX | OPERATING COMPANY

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OCT 28 2026
MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

CERTIFIED MAIL

October 27, 2026

To: Lease Owner
Address
City, State, Zip

From: Phoenix Operating LLC
4643 South Ulster Street Suite 1510
Denver, Colorado 80237

Re: Proposed Private Saltwater Disposal Well – THE UNFORGIVEN 1 SWD
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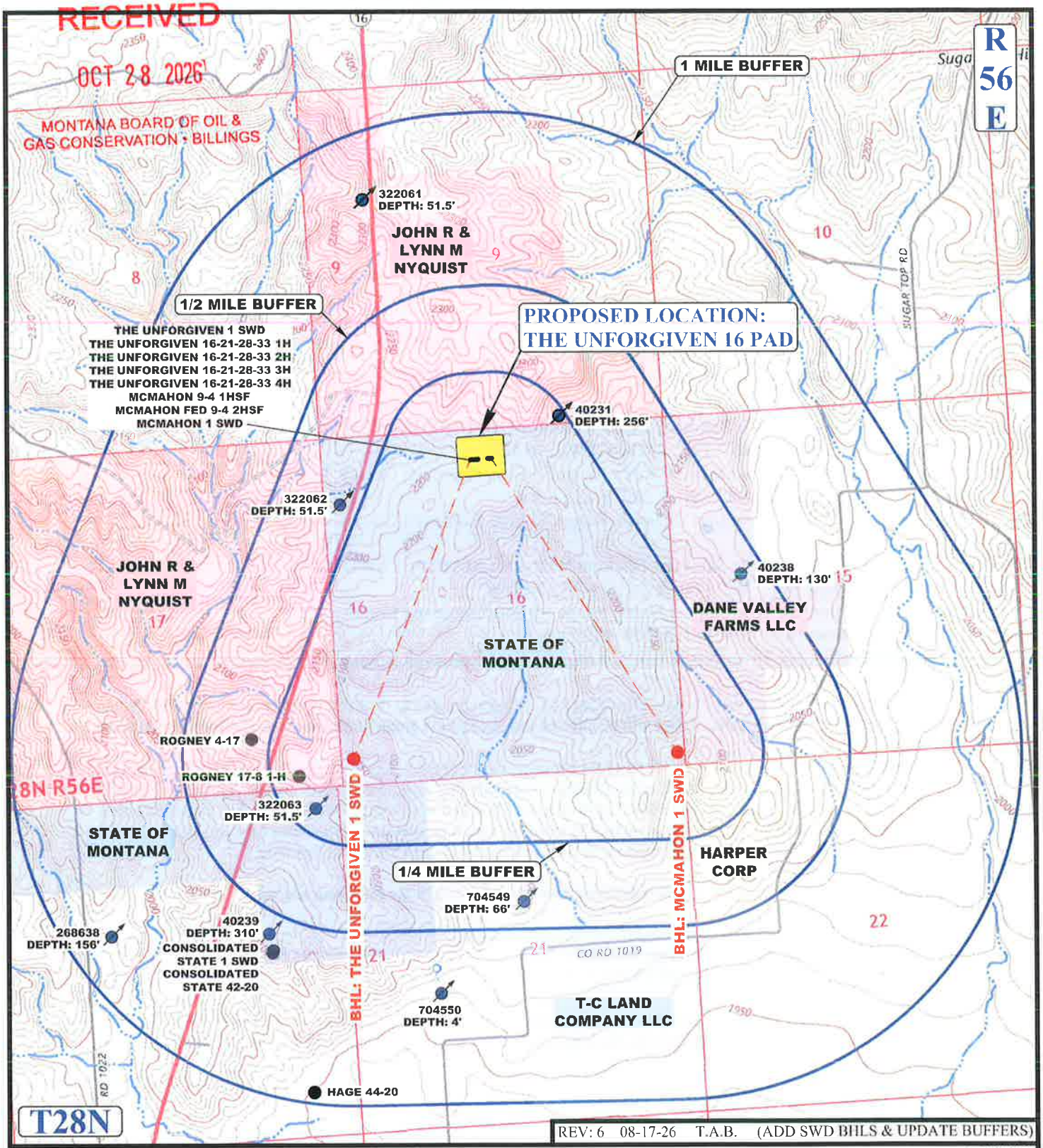
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- WATER WELLS

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PHOENIX OPERATING LLC

THE UNFORGIVEN 16 PAD
NE 1/4 NW 1/4, SECTION 16, T28N, R56E, P.M.M.
ROOSEVELT COUNTY, MONTANA

SURVEYED BY	D.L., R.T.	07-08-26	SCALE
DRAWN BY	C.S.C.	11-12-25	1 : 24,000
WELL PROXIMITY MAP			TOPO C

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