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

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MONTANA BOARD OF OIL & GAS CONSERVATION • BILLINGS

****

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 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 3rd 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 MASTERSON CIRCLE
BILLINGS, MONTANA 59106
(406) 248-4141
scotti@graylawmt.com

January 6, 2026

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JAN 06 2026
MONTANA BOARD OF OIL &
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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.

51-2026

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

SCOTTI GRAY

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CERTIFICATE OF SERVICE

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:

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

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

Scotti Gray

Scotti Gray

51-2026

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

****

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 7th 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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90-2026

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. 19-2026

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 7th day of January, 2026.

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MONTANA BOARD OF OIL &
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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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91-2026

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

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

IN THE MATTER OF THE APPLICATION OF PHOENIX OPERATING LLC FOR ORDERS CREATING A TEMPORARY SPACING UNIT CONSISTING OF SECTIONS 1, 12, 13 & 24 TOWNSHIP 27 NORTH, RANGE 55 EAST, ROOSEVELT AND/OR RICHLAND COUNTIES, MONTANA, AND AUTHORIZING THE DRILLING OF AND PRODUCTION FROM A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL WITHIN AND UPON THE REQUESTED TEMPORARY SPACING UNIT AT ANY LOCATION NOT CLOSER THAN 200' (HEEL/TOE SETBACKS) AND 500' (LATERAL SETBACKS) OF THE BOUNDARIES OF THE TEMPORARY SPACING UNIT, AND ADDITIONALLY VACATING AND RESCINDING BOARD ORDER NO. 380-2011 , AND ANY OTHER RELIEF AS THE BOARD AND THE BLM MAY DEEM APPROPRIATE	**APPLICATION** **MBOGC DOCKET NO.** 134 **-2026** **BLM DOCKET NO.** 23-2026

PHOENIX OPERATING LLC ("APPLICANT"), 4643 South Ulster Street, Suite 1510, Denver, Colorado, 80237, presents the following Application:

1. Applicant is an interest owner within all or portions of the following described lands located in Roosevelt and/or Richland Counties, Montana, to wit:

   Township 27 North, Range 55 East, M.P.M.
   Section 1: All
   Section 12: All
   Section 13: All
   Section 24: All

   Containing 2,394.39 acres, more or less.

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2. Applicant draws the Boards attention to the fact that federal minerals are located within certain tracts affected by this Application; specifically including portions of Sections 12, 13, and 24, Township 27 North, Range 55 East, Roosevelt and/or Richland Counties, Montana.

3. A portion of the proposed TSU is Indian land, namely a portion of the S/2 of Section 1, and a portion of the N/2 of Section 12, Township 27 North, Range 55 East, Roosevelt and/or

Richland Counties, and accordingly, the MOU between the United States BLM and the MBOGC is applicable hereto.

4. Sections 1, 12, 13, and 24, Township 27 North, Range 55 East, Roosevelt and/or Richland Counties, Montana, are presently subject only to Board Order No. 380-2011 which designates areawide state spacing.

5. In order to protect correlative rights, and in order to more efficiently and economically recover Bakken/Three Forks Formation reserves underlying the above-described lands, Applicant proposes to drill a horizontal Bakken/Three Forks Formation well within and upon, but not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks) to the exterior boundaries of a temporary spacing unit comprised of All of Sections 1, 12, 13, and 24, Township 27 North, Range 55 East, Roosevelt and/or Richland Counties, Montana.

6. Applicant believes the requested 200' (heel/toe) and 500' (lateral) setbacks from the requested temporary spacing unit boundaries are necessary in order adequately and efficiently increase the ultimate recovery of Bakken/Three Forks Formation oil and associated natural gas from the reserves underlying the requested temporary spacing unit.

7. In the event that Applicant's proposed horizontal Bakken/Three Forks Formation well, referred to above, is authorized by this Board and the BLM, and is thereafter drilled and completed as a well capable of commercial production, within ninety (90) days, of such completion Applicant will file an application for Board and the BLM consideration of permanent spacing and other matters relating to production from said well.

Accordingly, Applicant requests the following:

1. This matter be set for hearing by the Board and the BLM and notice thereof be provided as required by law and the MOU;

2. After hearing this matter, the Board and the BLM enter Orders vacating and rescinding Board Order No. 380-2011, insofar as it applies to Sections 1, 12, 13 and 24, Township 27 North, Range 55 East, Roosevelt and/or Richland Counties, Montana;

3. After hearing this matter, the Board and the BLM enter Orders designating Sections 1, 12, 13, and 24, Township 27 North, Range 55 East, Roosevelt and/or Richland Counties, Montana, as a temporary spacing unit, and authorizing the drilling of a horizontal Bakken/Three Forks Formation well at any location within the temporary spacing unit, but not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks), to the exterior

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boundaries thereof, provided that operations for the drilling of such well must be commenced within one year from the date of such requested Orders;

4. Within ninety (90) days of first production from the requested authorized horizontal Bakken/Three Forks Formation well, Applicant shall submit an Application to the Board and the BLM requesting the establishment of a permanent spacing unit; and

5. For any such other or additional relief, including but not limited to vacating and/or rescinding any other conflicting Board/BLM Orders not herein identified by Applicant which cover the above-described lands; and any other relief deemed appropriate by the Board and the BLM.

Dated January 7, 2026.

KEARNEY, MCWILLIAMS & DAVIS, PLLC

By: 

Wendy A. Johnson
wjohnson@kmd.law
55 Waugh, Suite 150
Houston, TX 77007
Attorney for Phoenix Operating LLC

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

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

IN THE MATTER OF THE APPLICATION OF PHOENIX OPERATING LLC FOR ORDERS AUTHORIZING THE DRILLING OF UP TO THREE (3) ADDITIONAL HORIZONTAL BAKKEN/THREE FORKS FORMATION WELLS WITHIN AND UPON THE TEMPORARY SPACING UNIT COMPRISED OF ALL OF SECTIONS 1, 12, 13 & 24, TOWNSHIP 27 NORTH, RANGE 55 EAST, ROOSEVELT AND/OR RICHLAND COUNTIES, MONTANA, AT ANY LOCATION NOT CLOSER THAN 200' (HEEL/TOE SETBACKS) AND 500' (LATERAL SETBACKS) TO THE BOUNDARIES THEREOF, AND ANY OTHER RELIEF AS THE BOARD AND THE BLM MAY DEEM APPROPRIATE	**APPLICATION** **MBOGC DOCKET NO.** 135 **-2026** **BLM DOCKET NO.** 24-2026

PHOENIX OPERATING LLC ("APPLICANT"), 4643 South Ulster Street, Suite 1510, Denver, Colorado, 80237, presents the following Application:

1. Applicant is an interest owner within all or portions of the following described lands located in Roosevelt and/or Richland Counties, Montana, to wit:

   Township 27 North, Range 55 East, M.P.M.
   Section 1: All
   Section 12: All
   Section 13: All
   Section 24: All

   Containing 2,394.39 acres, more or less.

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   It is anticipated that the above-described lands will comprise a temporary spacing unit for purposes of the Bakken/Three Forks Formation production pursuant to Board Order No. _____-2026.

2. Applicant draws the Boards attention to the fact that federal minerals are located within certain tracts affected by this Application; specifically including portions of Sections 12, 13, and 24, Township 27 North, Range 55 East, Roosevelt and/or Richland Counties, Montana.

3. A portion of the proposed TSU is Indian land, namely a portion of the S/2 of Section 1, and a portion of the N/2 of Section 12, Township 27 North, Range 55 East, Roosevelt and/or

Richland Counties, and accordingly, the MOU between the United States BLM and the MBOGC is applicable hereto.

4. Applicant requests Orders from this Board and the BLM authorizing the drilling of and production of up to three (3) additional horizontal Bakken/Three Forks Formation wells within and upon the temporary spacing unit described above, at any location not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks) to the exterior boundaries of said temporary spacing unit.

5. Applicant believes that approval and granting of the request herein will be in the best interest of prevention of waste of oil and associated natural gas and the conservation thereof and will protect the correlative rights of all interested parties.

Accordingly, Applicant requests the following:

1. This matter be set for hearing by the Board and the BLM and notice thereof be provided as required by law and the MOU;

2. After hearing this matter, the Board and the BLM enter Orders authorizing the Applicant to drill up to three (3) additional horizontal Bakken/Three Forks Formation wells at any location within and upon the temporary spacing unit consisting of Sections 1, 12, 13 and 24, Township 27 North, Range 55 East, Roosevelt and/or Richland Counties, but not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks) to the exterior boundaries of said temporary spacing unit; and

3. For any such other or additional relief as this Board and the BLM may deem appropriate.

Dated January 7, 2026.

KEARNEY, MCWILLIAMS & DAVIS, PLLC

By: _____

Wendy A. Johnson
wjohnson@kmd.law
55 Waugh, Suite 150
Houston, TX 77007
Attorney for Phoenix Operating LLC

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

IN THE MATTER OF THE APPLICATION OF PHOENIX OPERATING LLC FOR AN ORDER CREATING A TEMPORARY SPACING UNIT CONSISTING OF SECTIONS 28 AND 33, TOWNSHIP 27 NORTH, RANGE 55 EAST, AND SECTIONS 4 AND 9, TOWNSHIP 26 NORTH, RANGE 55 EAST, RICHLAND COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF AND PRODUCTION FROM A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL WITHIN AND UPON THE REQUESTED TEMPORARY SPACING UNIT AT ANY LOCATION NOT CLOSER THAN 200' (HEEL/TOE SETBACKS) AND 500' (LATERAL SETBACKS) OF THE BOUNDARIES OF THE TEMPORARY SPACING UNIT, AND ADDITIONALLY VACATING AND RESCINDING BOARD ORDER NOS. 436-2005 AND 293-2011, AND ANY OTHER RELIEF AS THE BOARD MAY DEEM APPROPRIATE	**APPLICATION** **MBOGC DOCKET NO. 146 -2026**

PHOENIX OPERATING LLC ("APPLICANT"), 4643 South Ulster Street, Suite 1510, Denver, Colorado, 80237, presents the following Application:

1. Applicant is an interest owner within all or portions of the following described lands located in Richland County, Montana, to wit:

   Township 27 North, Range 55 East, M.P.M.
   Section 28: All
   Section 33: All

   Township 26 North, Range 55 East, M.P.M.
   Section 4: All
   Section 9: All

   Containing 2,560.00 acres, more or less.

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2. Applicant draws the Boards attention to the fact that federal minerals are located within certain tracts affected by this Application; including portions of Section 33, Township 27 North, Range 55 East, and Sections 4 and 9, Township 26 North, Range 55 East, Richland County, Montana.

3. Sections 4 and 9, Township 26 North, Range 55 East, Richland County, Montana, are subject to Board Order No. 436-2005, dated December 8, 2005, which designated all of Sections 4 and 9, Township 26 North, Range 55 East, Richland County, Montana, as a temporary spacing unit for the drilling of a multilateral horizontal Bakken Formation well. The proposed well that was the subject of the foregoing Order was never drilled, nor has said Order been vacated by this Board.

4. Sections 4 and 9 are subject to Board Order No. 293-2011, dated October 13, 2011, which amended the setbacks for the temporary spacing unit comprised of All of Sections 4 and 9, Township 26 North, Range 55 East, Richland County, Montana.

5. Sections 28 and 33, Township 27 North, Range 55 East, Richland County, Montana, are presently subject only to Board Order No. 380-2011 which designates areawide state spacing.

6. In order to protect correlative rights, and in order to more efficiently and economically recover Bakken/Three Forks Formation reserves underlying the above-described lands, Applicant proposes to drill a horizontal Bakken/Three Forks Formation well within and upon, but not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks) to the exterior boundaries of a temporary spacing unit comprised of All of Sections 28 and 33, Township 27 North, Range 55 East, and Sections 4 and 9, Township 26 North, Range 55 East, Richland County, Montana.

7. Applicant believes the requested 200' (heel/toe) and 500' (lateral) setbacks from the requested temporary spacing unit boundaries are necessary in order adequately and efficiently increase the ultimate recovery of Bakken/Three Forks Formation oil and associated natural gas from the reserves underlying the requested temporary spacing unit.

8. In the event that Applicant's proposed horizontal Bakken/Three Forks Formation well, referred to above, is authorized by this Board and is thereafter drilled and completed as a well capable of commercial production, within ninety (90) days, of such completion Applicant will file an application for Board consideration of permanent spacing and other matters relating to production from said well.

Accordingly, Applicant requests the following:

1. This matter be set for hearing by the Board and notice thereof be provided as required by law and the MOU;

2. After hearing this matter, the Board enter its order vacating and rescinding Board Order Nos. 436-2005 and 293-2011, and terminating the temporary spacing units created thereby;

3. After hearing this matter, the Board enter its Order vacating and rescinding Board Order No. 380-2011, insofar as it applies to Sections 28 and 33, Township 27 North, Range 55 East, Richland County, Montana;

4. After hearing this matter, the Board enter its Order designating All of Sections 28 and 33, Township 27 North, Range 55 East, and Sections 4 and 9, Township 26 North, Range 55 East, Richland County, Montana, as a temporary spacing unit, and authorizing the drilling of a horizontal Bakken/Three Forks Formation well at any location within the temporary spacing unit, but not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks), to the exterior boundaries thereof, provided that operations for the drilling of such well must be commenced within one year from the date of such requested Order;

5. Within ninety (90) days of first production from the requested authorized horizontal Bakken/Three Forks Formation well, Applicant shall submit an Application to the Board requesting the establishment of a permanent spacing unit; and

6. For any such other or additional relief, including but not limited to vacating and/or rescinding any other conflicting Board Orders not herein identified by Applicant which cover the above-described lands; and any other relief deemed appropriate by the Board.

Dated January 7, 2026.

KEARNEY, MCWILLIAMS & DAVIS, PLLC

By: 

Wendy A. Johnson
wjohnson@kmd.law
55 Waugh, Suite 150
Houston, TX 77007
Attorney for Phoenix Operating LLC

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

IN THE MATTER OF THE APPLICATION OF PHOENIX OPERATING LLC FOR AN ORDER AUTHORIZING THE DRILLING OF UP TO THREE (3) ADDITIONAL HORIZONTAL BAKKEN/THREE FORKS FORMATION WELLS WITHIN AND UPON THE TEMPORARY SPACING UNIT COMPRISED OF ALL OF SECTIONS 28 AND 33, TOWNSHIP 27 NORTH, RANGE 55 EAST, AND SECTIONS 4 AND 9, TOWNSHIP 26 NORTH, RANGE 55 EAST, RICHLAND COUNTY, MONTANA, AT ANY LOCATION NOT CLOSER THAN 200' (HEEL/TOE SETBACKS) AND 500' (LATERAL SETBACKS) TO THE BOUNDARIES THEREOF, AND ANY OTHER RELIEF AS THE BOARD MAY DEEM APPROPRIATE	**APPLICATION** **MBOGC DOCKET NO. 147 -2026**

PHOENIX OPERATING LLC ("APPLICANT"), 4643 South Ulster Street, Suite 1510, Denver, Colorado, 80237, presents the following Application:

1. Applicant is an interest owner within all or portions of the following described lands located in Richland County, Montana, to wit:

   Township 27 North, Range 55 East, M.P.M.
   Section 28: All
   Section 33: All

   Township 26 North, Range 55 East, M.P.M.
   Section 4: All
   Section 9: All

   Containing 2,560.00 acres, more or less.

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   It is anticipated that the above-described lands will comprise a temporary spacing unit for purposes of the Bakken/Three Forks Formation production pursuant to Board Order No. _____-2026.

2. Applicant draws the Boards attention to the fact that federal minerals are located within certain tracts affected by this Application; including portions of Section 33, Township 27 North, Range 55 East, and Sections 4 and 9, Township 26 North, Range 55 East, Richland County, Montana.

3. Applicant requests an Order from this Board authorizing the drilling of and production of up to three (3) additional horizontal Bakken/Three Forks Formation wells within and upon the temporary spacing unit described above, at any location not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks) to the exterior boundaries of said temporary spacing unit.

4. Applicant believes that approval and granting of the request herein will be in the best interest of prevention of waste of oil and associated natural gas and the conservation thereof and will protect the correlative rights of all interested parties.

Accordingly, Applicant requests the following:

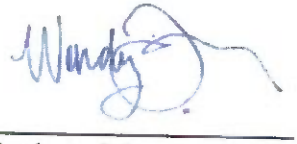
1. This matter be set for hearing by the Board and notice thereof be provided as required by law and the MOU;

2. After hearing this matter, the Board enter its Order authorizing the Applicant to drill up to three (3) additional horizontal Bakken/Three Forks Formation wells at any location within and upon the temporary spacing unit consisting of All of Sections 28 and 33, Township 27 North, Range 55 East, and Sections 4 and 9, Township 26 North, Range 55 East, Richland County, Montana, but not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks) to the exterior boundaries of said temporary spacing unit; and

3. For any such other or additional relief as the Board may deem appropriate.

Dated January 7, 2026.

KEARNEY, MCWILLIAMS & DAVIS, PLLC

By: 

Wendy A. Johnson
wjohnson@kmd.law
55 Waugh, Suite 150
Houston, TX 77007
Attorney for Phoenix Operating LLC

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

IN THE MATTER OF THE APPLICATION OF PHOENIX OPERATING LLC FOR AN ORDER CREATING A TEMPORARY SPACING UNIT CONSISTING OF SECTIONS 2, 11 AND 14, TOWNSHIP 26 NORTH, RANGE 55 EAST, RICHLAND COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF AND PRODUCTION FROM A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL WITHIN AND UPON THE REQUESTED TEMPORARY SPACING UNIT AT ANY LOCATION NOT CLOSER THAN 200' (HEEL/TOE SETBACKS) AND 500' (LATERAL SETBACKS) OF THE BOUNDARIES OF THE TEMPORARY SPACING UNIT, AND ADDITIONALLY VACATING AND RESCINDING BOARD ORDER NOs. 438-2005, 71-2010, 293-2011, AND 294-2011, AND ANY OTHER RELIEF AS THE BOARD MAY DEEM APPROPRIATE	**APPLICATION** **MBOGC DOCKET NO. 150 -2026**

PHOENIX OPERATING LLC ("APPLICANT"), 4643 South Ulster Street, Suite 1510, Denver, Colorado, 80237, presents the following Application:

1. Applicant is an interest owner within all or portions of the following described lands located in Richland County, Montana, to wit:

   Township 26 North, Range 55 East, M.P.M.
   Section 2: All
   Section 11: All
   Section 14: All

   Containing 1,920 acres, more or less.

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2. Applicant draws the Boards attention to the fact that federal minerals are located within certain tracts affected by this Application; including portions of Sections 2 and 14, Township 26 North, Range 55 East, Richland County, Montana.

3. Sections 2 and 11 are subject to Board Order No. 438-2005, dated December 8, 2005, which designated all of Sections 2 and 11, Township 26 North, Range 55 East, Richland County, Montana, as a temporary spacing unit for the drilling of a multilateral horizontal Bakken Formation well. Said Board Order was amended by Board Order No. 293-2011, dated October 13, 2011, which allowed said horizontal wells to be located anywhere in the temporary spacing unit, but not closer than 200' (heel/toe setback) and 1320' (lateral setback) to the boundaries.

4. Section 14 is subject to Board Order No. 71-2010, dated April 29, 2010, which designated All of Sections 14 and 23, Township 26 North, Range 55 East, Richland County, Montana, as a temporary spacing unit for the drilling of a Bakken/Three Forks Formation Horizontal well. Said Board Order was amended by Board Order No. 294-2011, dated October 13, 2011, which allowed said horizontal wells to be located anywhere in the temporary spacing unit, but not closer than 200' (heel/toe setback) and 1320' (lateral setback) to the boundaries.

5. In order to protect correlative rights, and in order to more efficiently and economically recover Bakken/Three Forks Formation reserves underlying the above-described lands, Applicant proposes to drill a horizontal Bakken/Three Forks Formation well within and upon, but not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks) to the exterior boundaries of a temporary spacing unit comprised of All of Sections 2, 11, and 14, Township 26 North, Range 55 East, Richland County, Montana

6. Applicant believes the requested 200' (heel/toe) and 500' (lateral) setbacks from the requested temporary spacing unit boundaries are necessary in order adequately and efficiently increase the ultimate recovery of Bakken/Three Forks Formation oil and associated natural gas from the reserves underlying the requested temporary spacing unit.

7. In the event that Applicant's proposed horizontal Bakken/Three Forks Formation well, referred to above, is authorized by this Board and is thereafter drilled and completed as a well capable of commercial production, within ninety (90) days, of such completion Applicant will file an application for Board consideration of permanent spacing and other matters relating to production from said well.

Accordingly, Applicant requests the following:

1. This matter be set for hearing by the Board and notice thereof be provided as required by law and the MOU;

2. After hearing this matter, the Board enter its order vacating and rescinding Board Order Nos. 438-2005, 71-2010, 293-2011, and 294-2011, and terminating the temporary spacing units created thereby;

3. After hearing this matter, the Board enter its Order designating All of Sections 2, 11 and 14, Township 26 North, Range 55 East, Richland County, Montana, as a temporary spacing unit, and authorizing the drilling of a horizontal Bakken/Three Forks Formation well at any location within the temporary spacing unit, but not closer than 200' (heel/toe setbacks) and

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500' (lateral setbacks), to the exterior boundaries thereof, provided that operations for the drilling of such well must be commenced within one year from the date of such requested Order;

4. Within ninety (90) days of first production from the requested authorized horizontal Bakken/Three Forks Formation well, Applicant shall submit an Application to the Board requesting the establishment of a permanent spacing unit; and

5. For any such other or additional relief, including but not limited to vacating and/or rescinding any other conflicting Board Orders not herein identified by Applicant which cover the above-described lands; and any other relief deemed appropriate by the Board.

Dated January 7, 2026.

KEARNEY, MCWILLIAMS & DAVIS, PLLC

By: _____

Wendy A. Johnson
wjohnson@kmd.law
55 Waugh, Suite 150
Houston, TX 77007
Attorney for Phoenix Operating LLC

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

IN THE MATTER OF THE APPLICATION OF PHOENIX OPERATING LLC FOR AN ORDER AUTHORIZING THE DRILLING OF UP TO THREE (3) ADDITIONAL HORIZONTAL BAKKEN/THREE FORKS FORMATION WELLS WITHIN AND UPON THE TEMPORARY SPACING UNIT COMPRISED OF ALL OF SECTIONS 2, 11 AND 14, TOWNSHIP 26 NORTH, RANGE 55 EAST, RICHLAND COUNTY, MONTANA, AT ANY LOCATION NOT CLOSER THAN 200' (HEEL/TOE SETBACKS) AND 500' (LATERAL SETBACKS) TO THE BOUNDARIES THEREOF, AND ANY OTHER RELIEF AS THE BOARD MAY DEEM APPROPRIATE	**APPLICATION** **MBOGC DOCKET NO. 151 -2026**

PHOENIX OPERATING LLC ("APPLICANT"), 4643 South Ulster Street, Suite 1510, Denver, Colorado, 80237, presents the following Application:

1. Applicant is an interest owner within all or portions of the following described lands located in Richland County, Montana, to wit:

   Township 26 North, Range 55 East, M.P.M.
   Section 2: All
   Section 11: All
   Section 14: All

   Containing 1,920 acres, more or less.

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   It is anticipated that the above-described lands will comprise a temporary spacing unit for purposes of the Bakken/Three Forks Formation production pursuant to Board Order No. _____-2026.

2. Applicant draws the Boards attention to the fact that federal minerals are located within certain tracts affected by this Application; including portions of Sections 2 and 14, Township 26 North, Range 55 East, Richland County, Montana.

3. Applicant requests an Order from this Board authorizing the drilling of and production of up to three (3) additional horizontal Bakken/Three Forks Formation wells within and upon the temporary spacing unit described above, at any location not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks) to the exterior boundaries of said temporary spacing unit.

4. Applicant believes that approval and granting of the request herein will be in the best interest of prevention of waste of oil and associated natural gas and the conservation thereof and will protect the correlative rights of all interested parties.

Accordingly, Applicant requests the following:

1. This matter be set for hearing by the Board and notice thereof be provided as required by law and the MOU;

2. After hearing this matter, the Board enter its Order authorizing the Applicant to drill up to three (3) additional horizontal Bakken/Three Forks Formation wells at any location within and upon the temporary spacing unit consisting of Sections 2, 11 and 14, Township 26 North, Range 55 East, Richland County, Montana, but not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks) to the exterior boundaries of said temporary spacing unit; and

3. For any such other or additional relief as the Board may deem appropriate.

Dated January 7, 2026.

KEARNEY, MCWILLIAMS & DAVIS, PLLC

By: _____

Wendy A. Johnson
wjohnson@kmd.law
55 Waugh, Suite 150
Houston, TX 77007
Attorney for Phoenix Operating LLC

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

IN THE MATTER OF THE APPLICATION OF PHOENIX OPERATING LLC FOR AN ORDER CREATING A TEMPORARY SPACING UNIT CONSISTING OF SECTIONS 3, 10, 15, 22 AND 27, TOWNSHIP 26 NORTH, RANGE 55 EAST, RICHLAND COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF AND PRODUCTION FROM A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL WITHIN AND UPON THE REQUESTED TEMPORARY SPACING UNIT AT ANY LOCATION NOT CLOSER THAN 200' (HEEL/TOE SETBACKS) AND 500' (LATERAL SETBACKS) OF THE BOUNDARIES OF THE TEMPORARY SPACING UNIT, AND ADDITIONALLY VACATING AND RESCINDING BOARD NOs. 437-2005, 168-2011, 357-2011 AND 380-2011, AND ANY OTHER RELIEF AS THE BOARD MAY DEEM APPROPRIATE	**APPLICATION** **MBOGC DOCKET NO. 152 -2026**

PHOENIX OPERATING LLC ("APPLICANT"), 4643 South Ulster Street, Suite 1510, Denver, Colorado, 80237, presents the following Application:

1. Applicant is an interest owner within all or portions of the following described lands located in Richland County, Montana, to wit:

   Township 26 North, Range 55 East, M.P.M.
   Section 3: All
   Section 10: All
   Section 15: All
   Section 22: All
   Section 27: All
   Containing 3,200 acres, more or less.

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2. Applicant draws the Boards attention to the fact that federal minerals are located within certain tracts affected by this Application; including portions of Sections 3, 10, and 15, Township 26 North, Range 55 East, Richland County, Montana.

3. Sections 3 and 10, Township 26 North, Range 55 East, Richland County, Montana, are subject to Amended Board Order No. 437-2005, dated December 8, 2005, which designated All of Sections 3 and 10, Township 26 North, Range 55 East, Richland County, Montana, as a temporary spacing unit for the drilling of a multilateral horizontal Bakken Formation well. Said Board Order was amended by Board Order No. 168-2011, dated June 16, 2011, which allowed a single Bakken/Three Forks horizontal well to be located

anywhere in the temporary spacing unit, but not closer than 200' to the North/South boundaries and 500' to the East/West boundaries.

4. Sections 15 and 22 are subject to Board Order No. 357-2011, dated October 13, 2011, which designated All of Sections 15 and 22, Township 26 North, Range 55 East, Richland County, Montana, as a temporary spacing unit for the drilling of a Bakken Formation Horizontal well.

5. Section 27, Township 26 North, Range 55 East, Richland County, Montana, is presently subject only to Board Order No. 380-2011 which designates areawide state spacing.

6. The Dugout Federal 1-15 Well, which is located in Section 15, Township 26 North, Range 55 East, is a currently producing vertical well from the Red River Formation. The Applicant is not aware of any additional producing wells within the proposed temporary spacing unit.

7. In order to protect correlative rights, and in order to more efficiently and economically recover Bakken/Three Forks Formation reserves underlying the above-described lands, Applicant proposes to drill a horizontal Bakken/Three Forks Formation well within and upon, but not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks) to the exterior boundaries of a temporary spacing unit comprised of All of Sections 3, 10, 15, 22 and 27, Township 26 North, Range 55 East, Richland County, Montana.

8. Applicant believes the requested 200' (heel/toe) and 500' (lateral) setbacks from the requested temporary spacing unit boundaries are necessary in order adequately and efficiently increase the ultimate recovery of Bakken/Three Forks Formation oil and associated natural gas from the reserves underlying the requested temporary spacing unit.

9. In the event that Applicant's proposed horizontal Bakken/Three Forks Formation well, referred to above, is authorized by this Board and is thereafter drilled and completed as a well capable of commercial production, within ninety (90) days, of such completion Applicant will file an application for Board consideration of permanent spacing and other matters relating to production from said well.

Accordingly, Applicant requests the following:

1. This matter be set for hearing by the Board and notice thereof be provided as required by law and the MOU;

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2. After hearing this matter, the Board enter its order vacating and rescinding Board Order Nos. 437-2005, 168-2011, and 357-2011, and terminating the temporary spacing units created thereby and further rescinding authorization to drill additional Bakken/Three Forks Formation wells within said temporary spacing units;

3. After hearing this matter, the Board enter its Order vacating and rescinding Board Order No. 380-2011, insofar as it applies to Section 27, Township 26 North, Range 55 East, Richland County, Montana;

4. After hearing this matter, the Board enter its Order designating Sections 3, 10, 15, 22 and 27, Township 26 North, Range 55 East, Richland County, Montana, as a temporary spacing unit, and authorizing the drilling of a horizontal Bakken/Three Forks Formation well at any location within the temporary spacing unit, but not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks), to the exterior boundaries thereof, provided that operations for the drilling of such well must be commenced within one year from the date of such requested Order;

5. Within ninety (90) days of first production from the requested authorized horizontal Bakken/Three Forks Formation well, Applicant shall submit an Application to the Board requesting the establishment of a permanent spacing unit; and

6. For any such other or additional relief, including but not limited to vacating and/or rescinding any other conflicting Board Orders not herein identified by Applicant which cover the above-described lands; and any other relief deemed appropriate by the Board.

Dated January 7, 2026.

KEARNEY, MCWILLIAMS & DAVIS, PLLC

By: _____

Wendy A. Johnson
wjohnson@kmd.law
55 Waugh, Suite 150
Houston, TX 77007
Attorney for Phoenix Operating LLC

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GAS CONSERVATION • BILLINGS

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

IN THE MATTER OF THE APPLICATION OF PHOENIX OPERATING LLC FOR AN ORDER AUTHORIZING THE DRILLING OF UP TO THREE (3) ADDITIONAL HORIZONTAL BAKKEN/THREE FORKS FORMATION WELLS WITHIN AND UPON THE TEMPORARY SPACING UNIT COMPRISED OF ALL OF SECTIONS 3, 10, 15, 22 AND 27, TOWNSHIP 26 NORTH, RANGE 55 EAST, RICHLAND COUNTY, MONTANA, AT ANY LOCATION NOT CLOSER THAN 200' (HEEL/TOE SETBACKS) AND 500' (LATERAL SETBACKS) TO THE BOUNDARIES THEREOF, AND ANY OTHER RELIEF AS THE BOARD MAY DEEM APPROPRIATE	**APPLICATION** **MBOGC DOCKET NO. 153 -2026**

PHOENIX OPERATING LLC ("APPLICANT"), 4643 South Ulster Street, Suite 1510, Denver, Colorado, 80237, presents the following Application:

1. Applicant is an interest owner within all or portions of the following described lands located in Richland County, Montana, to wit:

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Township 26 North, Range 55 East, M.P.M.
Section 3: All
Section 10: All
Section 15: All
Section 22: All
Section 27: All

Containing 3,200 acres, more or less.

It is anticipated that the above-described lands will comprise a temporary spacing unit for purposes of the Bakken/Three Forks Formation production pursuant to Board Order No. _____-2026.

2. Applicant draws the Boards attention to the fact that federal minerals are located within certain tracts affected by this Application; including portions of Sections 3, 10, and 15, Township 26 North, Range 55 East, Richland County, Montana.

3. Applicant requests an Order from this Board authorizing the drilling of and production of up to three (3) additional horizontal Bakken/Three Forks Formation wells within and upon the temporary spacing unit described above, at any location not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks) to the exterior boundaries of said temporary spacing unit.

4. Applicant believes that approval and granting of the request herein will be in the best interest of prevention of waste of oil and associated natural gas and the conservation thereof and will protect the correlative rights of all interested parties.

Accordingly, Applicant requests the following:

1. This matter be set for hearing by the Board and notice thereof be provided as required by law and the MOU;

2. After hearing this matter, the Board enter its Order authorizing the Applicant to drill up to three (3) additional horizontal Bakken/Three Forks Formation wells at any location within and upon the temporary spacing unit consisting of Sections 3, 10, 15, 22 and 27, Township 26 North, Range 55 East, Richland County, Montana, but not closer than 200' (heel/toe setbacks) and 500' (lateral setbacks) to the exterior boundaries of said temporary spacing unit; and

3. For any such other or additional relief as the Board may deem appropriate.

Dated January 7, 2026.

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KEARNEY, MCWILLIAMS & DAVIS, PLLC

By: _____

Wendy A. Johnson
wjohnson@kmd.law
55 Waugh, Suite 150
Houston, TX 77007
Attorney for Phoenix Operating LLC

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. 1988-2026

AMENDED APPLICATION

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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 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
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 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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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.

MBOGC Docket No. 194-2026

APPLICATION 39-2026 FED

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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.

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

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

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

[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 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

MBOGC Docket No.	195-2026
APPLICATION	40-2026 FED

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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.

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

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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.

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

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.

MBOGC Docket No. 196-2026

APPLICATION 41-2026 FED

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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.

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

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4. 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 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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196-2026

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

MBOGC Docket No.	197-2026
APPLICATION	42-2026 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

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

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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.

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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
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 ACREETED 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 ACCREETED THERETO
SECTON 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.

MBOGC Docket No. 198-2026

APPLICATION

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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.

[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 ACREETED 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 ACCREETED THERETO
SECTON 12: ALL

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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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198-2026

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

MBOGC Docket No. 199-2026

APPLICATION

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 ACREETED 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 ACCREETED THERETO
SECTON 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

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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.

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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GRAY LAW, PLLC

ATTORNEY AT LAW

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

January 12, 2026

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MONTANA BOARD OF OIL &
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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 the Northman 6-7-18-19 1H, Northman 6-7-18-19 2H, Northman 6-7-18-19 3H, Northman 6-7-18-19 4H Oil and Gas Wells by Phoenix Operating, LLC

Mr. Jones,

Pursuant to the Notice of Intention to apply for Permit to Drill an Oil and Gas Well published in the Northern Plains Independent on January 1, 2026, Continental Resources, Inc. ("Continental"), 20 N. Broadway, Oklahoma City, OK 73102, hereby protests and requests a hearing on the application of Phoenix Operating LLC ("Phoenix") for a permit to drill the Northman 6-7-18-19 1H, Northman 6-7-18-19 2H, Northman 6-7-18-19 3H and Northman 6-7-18-19 4H wells ("Northman Permits") in All of Sections 6, 7, 18 and 19, T28N, R56E, Roosevelt County, Montana on the following grounds:

1) Continental owns a 13.13% interest in the spacing unit comprised of Sections 6, 7, 18 and 19, T28N, R56E, Roosevelt County, Montana.

2) The record will show that approval of the Northman Permits would disrupt orderly development, promote waste and impair correlative rights contrary to Title 82, MCA.

3) Continental has drilled and completed thousands of wells in the Bakken/Three Forks formation with demonstrated commercial success and repeatable results. Continental plans to develop the spacing unit comprised of Sections 6, 7, 18 and 19, T28N, R56E as part of a block development plan comprised of at least three additional units to the west. Such block development will prevent waste by minimizing surface disturbance and increasing capital efficiency and insure orderly development of the area.

4) Montana law requires approval of the permits that best promote orderly development, protect correlative rights and prevent waste. The record will show that Continental's development plan satisfies those standards, while the Northman permits do not.

218-2026

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

SCOTTI GRAY

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CERTIFICATE OF SERVICE

I hereby certify that that on the 12th day of January 2026, I served a true and correct copy of the foregoing document to the following:

[X] U.S. Mail	Phoenix Operating LLC
[ ] Facsimile	4643 S Ulster, Ste 1510
[ ] FedEx	Denver, CO 80237
[X] E-mail	By email to attorney Wendy Johnson, wjohnson@kmd.law

Scotti Gray

Scotti Gray

218-2026

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FAX

Date 01/25/2026

Number of pages including cover sheet: 9

To:

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.

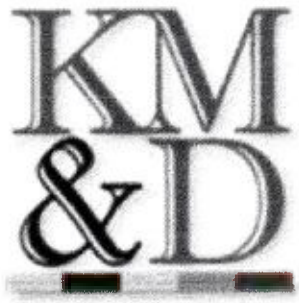
Sincerely,

Wendy A. Johnson
Senior Attorney
Licensed in Montana and Texas

<https://urldefense.com/v3/__http:/www.kmd.law/__;!!H9pxQksFkm_1OPXf!c0UAj6b
LH2Nob8lySgntlBPUabQUszteBYvjU5oQriQTJm3pTtCleZOezQ9Ejcs6AB6nRlJ-3nArG4e6EFV
dO-X5tg$>
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, 2nd Floor, Sheridan, WY 82801
Cell: (406) 368-1778

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223-2026

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., 2nd Floor, Sheridan, WY 82801
www.**KMD**.law

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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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223-2026

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)[1]. 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.

[1] 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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223-2026

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.
        2025.

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
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GAS CONSERVATION • BILLING

223-2026

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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223-2026

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
Amanda J. Jackson
ajackson@kmd.law
Attorneys for Phoenix Operating LLC

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

223-2026

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

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

By:_____
Wendy A. Johnson

RECEIVED
JAN 26 2026
MONTANA BOARD OF OIL & GAS CONSERVATION • BILLINGS

223-2026

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 **MNAXLP**

RECEIVED

JAN 26 2026

MONTANA BOARD OF OIL & GAS CONSERVATION • BILLINGS

223-2026

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, 2nd 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.

228-2026

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., 2nd Floor, Sheridan, WY 82801
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

228-2026

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:

228-2026

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

(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:

228-2026

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
Amanda J. Jackson
ajackson@kmd.law
Attorneys for Phoenix Operating LLC

228-2026

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

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

By:_____
Wendy A. Johnson

228-2026

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**

228-2026

KEARNEY MCWILLIAMS & DAVIS

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**

228-2026

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., 2nd Floor, Sheridan, WY 82801

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

www.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

229-2026

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:

229-2026

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

(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:

229-2026

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
Amanda J. Jackson
ajackson@kmd.law
Attorneys for Phoenix Operating LLC

229-2026

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

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

By: _____
Wendy A. Johnson

229-2026

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**

229-2026

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**

229-2026

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., 2nd Floor, Sheridan, WY 82801

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

www.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:

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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,

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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.

230-2026

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
Amanda J. Jackson
ajackson@kmd.law
Attorneys for Phoenix Operating LLC

230-2026

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

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

By: _____
Wendy A. Johnson

230-2026

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: Lemon1-19H**
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**

230-2026

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

REGARDING PHOENIX OPERATING LLC'S APPLICATIONS FOR PERMITS TO DRILL OIL AND GAS WELLS IN A TEMPORARY SPACING UNIT COMPRISED OF TOWNSHIP 23 NORTH, RANGE 59 EAST, SECTIONS 7, 8 & 9, AS PUBLISHED IN THE HELENA INDEPENDENT ON JANUARY 29, 2026	**DEMAND FOR OPPORTUNITY TO BE HEARD CONCERNING PHOENIX OPERATING LLC'S APPLICATIONS FOR PERMITS TO DRILL**

Pursuant to Montana Administrative Rule § 36.22.601, Kraken Oil & Gas LLC, 945 Bunker Hill Road, Suite 1200, Houston, Texas 77024, Phone No. (346) 739-8327 ("Kraken"), demands an opportunity to be heard concerning four (4) applications for permits to drill shown in the Notices of Intention to Apply for Permit to Drill Oil and Gas Well, published by Phoenix Operating LLC ("Phoenix") in the Helena Independent on January 29, 2026 ("Phoenix APDs"). The Phoenix APDs are for wells to be drilled within an approved temporary spacing unit established by Kraken on December 11, 2025 (Order No. 294-2025) comprised of Sections 7, 8 & 9, Township 23 North, Range 59 East ("Kraken TSU"). This demand is timely per A.R.M. § 36.22.601(6)(d). *Enclosed is a copy of Phoenix's Published Notices.*

The Phoenix APDs will impact Kraken's existing and future development plans for this area. Kraken owns over 50% working interest in the Kraken TSU and intends on developing this area along with two other laydown TSUs, which were also approved during the December 11, 2025 MBOGC hearings. Kraken owns working interests in all three of the laydown TSUs, and the Phoenix APDs would significantly impact Kraken's development plans for this area.

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

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

2. That after hearing the Board enter an Order denying Phoenix's permits.

3. For such other relief as the Board may deem appropriate.

Dated this 5th day of February, 2026.

Kraken Oil & Gas LLC

By _____
Uriah J. Price, Its Attorney

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

RECEIVED
FEB 05 2026
MONTANA BOARD OF OIL & GAS CONSERVATION • BILLINGS
232-2026

CERTIFICATE OF SERVICE

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

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

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

By Certified Mail to:
Phoenix Operating LLC
4643 S Ulster, Ste 1510
Denver, CO 80237

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

By: _____
Uriah J. Price

RECEIVED
FEB 05 2026
MONTANA BOARD OF OIL & GAS CONSERVATION • BILLINGS

232-2026

APPLICATION FOR PERMIT TO DRILL AN OIL AND GAS WELL

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

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

In the Matter of the application of
STELLAR 9-8-7 1H
by Phoenix Operating LLC
for a Permit to Drill an oil and gas well.

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

1. Name and address of Applicant:
Phoenix Operating LLC
4643 S Ulster, Ste 1510
Denver, CO 80237

2. Legal Description including County and Approximate Footages of Surface Location of Proposed Oil and Gas Well: (and projected bottom-hole location, if a directional or horizontal well)
Surface Location at 1826' FNL and 474' FWL in SWNW, Section 10, Township 23 North, Range 59 East, Richland County, Montana.
Bottom Hole Location at 550' FNL and 240' FWL in Lot 1, Section 7, Township 23 North, Range 59 East, Richland County, Montana.

3. Total Depth Proposed to be Drilled:
26100' Measured Depth, 10233' Total Vertical Depth

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

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

January 29, 2026 COL-MT-202099 MNAXLP

RECEIVED
FEB 05 2026
MONTANA BOARD OF OIL & GAS CONSERVATION • BILLINGS

232-2026

APPLICATION FOR PERMIT TO DRILL AN OIL AND GAS WELL

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

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

In the Matter of the application of
STELLAR 9-8-7 2H
by Phoenix Operating LLC

for a Permit to Drill an oil and gas well.

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

1. Name and address of Applicant:
Phoenix Operating LLC
4643 S Ulster, Ste 1510
Denver, CO 80237

2. Legal Description including County and Approximate Footages of Surface Location of Proposed Oil and Gas Well: (and projected bottom-hole location, if a directional or horizontal well)
Surface Location at 1856' FNL and 474' FWL in SWNW, Section 10, Township 23 North, Range 59 East, Richland County, Montana.
Bottom Hole Location at 1945' FNL and 240' FWL in Lot 2, Section 7, Township 23 North, Range 59 East, Richland County, Montana.

3. Total Depth Proposed to be Drilled:
25986' Measured Depth, 10233' Total Vertical Depth

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

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

January 29, 2026 COL-MT-202100 MNAXLP

RECEIVED
FEB 05 2026
MONTANA BOARD OF OIL & GAS CONSERVATION • BILLINGS
232-2026

APPLICATION FOR PERMIT TO DRILL AN OIL AND GAS WELL

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

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

In the Matter of the application of
STELLAR 9-8-7 3H
by Phoenix Operating LLC

for a Permit to Drill an oil and gas well.

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

1. Name and address of Applicant:
Phoenix Operating LLC
4643 S Ulster, Ste 1510
Denver, CO 80237

2. Legal Description including County and Approximate Footages of Surface Location of Proposed Oil and Gas Well: (and projected bottom-hole location, if a directional or horizontal well)
Surface Location at 1886' FNL and 474' FWL in SWNW, Section 10, Township 23 North, Range 59 East, Richland County, Montana.
Bottom Hole Location at 1945' FSL and 240' FWL in Lot 3, Section 7, Township 23 North, Range 59 East, Richland County, Montana.

3. Total Depth Proposed to be Drilled:
26131' Measured Depth, 10233' Total Vertical Depth

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

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

January 29, 2026 COL-MT-202098 MNAXLP

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MONTANA BOARD
GAS CONSERVATION BILLINGS
232-2026

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

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

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

In the Matter of the application of
STELLAR 9-8-7 4H
by Phoenix Operating LLC
for a Permit to Drill an oil and gas well.

1. Name and address of Applicant:
Phoenix Operating LLC
4643 S Ulster, Ste 1510
Denver, CO 80237

2. Legal Description including County and Approximate Footages of Surface Location of Proposed Oil and Gas Well: (and projected bottom-hole location, if a directional or horizontal well)
Surface Location at 1916' FNL and 474' FWL in SWNW, Section 10, Township 23 North, Range 59 East, Richland County, Montana.
Bottom Hole Location at 550' FNL and 240' FWL in Lot 4, Section 7, Township 23 North, Range 59 East, Richland County, Montana.

3. Total Depth Proposed to be Drilled:
26554' Measured Depth, 10233' Total Vertical Depth

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

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

January 29, 2026 COL-MT-202105 **MNAXLP**

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FEB 05 2026
MONTANA BOARD O
GAS CONSERVATION - BILLINGS
232-2026

Breton, Jennifer

From: Uriah Price <uprice@crowleyfleck.com>
Sent: Wednesday, February 18, 2026 9:36 AM
To: Jones, Ben; Breton, Jennifer
Cc: Don Lee; wjohnson@kmd.law; Kyla Sturm; John R. Lee
Subject: [EXTERNAL] RE: Kraken - 3 Demands for Opportunity to be Heard re Phoenix APDs
Attachments: 2026.02.05 Kraken - Protests of Phoenix APDs.pdf

Hello Ben,

It looks like Phoenix re-published the following APDs:

STELLAR 9-8-7 4H	Section 7, Township 23 North, Range 59 East

BAILIAN 15-14-13-18-17 1H	Section 17, Township 23 North, Range 60 East
BAILIAN 15-14-13-18-17 2H	Section 17, Township 23 North, Range 60 East
BAILIAN 15-14-13-18-17 3H	Section 17, Township 23 North, Range 60 East
BAILIAN 15-14-13-18-17 4H	Section 17, Township 23 North, Range 60 East

On February 5th we filed the attached Demand for Hearing on the Stellar and Bailian APDs (along with another). Keeping with past practice, we do not plan on refiling demands when Phoenix is required to re-publish notice due to errors in the original publication or otherwise. We wanted to call this to your attention and let you know that our existing Demands apply to these re-publications. Thanks, and let us know if you have any questions or concerns.

Uriah

NOTICE: This electronic mail transmission may constitute an Attorney-Client communication that is privileged at law. It is not intended for transmission to, or receipt by, any unauthorized persons. If you have received this electronic mail transmission in error, please delete it from your system without copying it, and notify the sender by reply e-mail or by calling Crowley Fleck PLLP, 406-252-3441, so that our address record can be corrected.

This email has been scanned for email related threats and delivered safely by Mimecast. For more information please visit http://www.mimecast.com [mimecast.com]

From: Uriah Price
Sent: Thursday, February 5, 2026 3:27 PM
To: Jones, Ben <bjones@mt.gov>; Breton, Jennifer <jennifer.breton@mt.gov>
Cc: Don Lee <don@leelawofficepc.com>; wjohnson@kmd.law; Kyla Sturm <ksturm@crowleyfleck.com>; John R. Lee <jlee@crowleyfleck.com>
Subject: Kraken - 3 Demands for Opportunity to be Heard re Phoenix APDs

232-2026

Ben and Jennifer,

Attached please find Kraken's Demands for Opportunity to be Heard regarding Phoenix APDs. Thanks,

Uriah

URIAH PRICE [crowleyfleck.com]
1915 South 19th Avenue
Bozeman, MT 59718
Main: 406.556.1430
Direct: 406.522.4548

CROWLEY | FLECK PLLP
ATTORNEYS [crowleyfleck.com]

WITH OFFICES IN MONTANA, NORTH DAKOTA, AND WYOMING:
BILLINGS [CROWLEYFLECK.COM] **BISMARCK** [CROWLEYFLECK.COM] **BOZEMAN** [CROWLEYFLECK.COM] **BUTTE** [CROWLEYFLECK.COM] **CASPER** [CROWLEYFLECK.COM] **CHEYENNE** [CROWLEYFLECK.COM] **HELENA** [CROWLEYFLECK.COM] **KALISPELL** [CROWLEYFLECK.COM] **MISSOULA** [CROWLEYFLECK.COM] **SHERIDAN** [CROWLEYFLECK.COM] **WILLISTON** [CROWLEYFLECK.COM]

232-2026

BOARD OF OIL AND GAS CONSERVATION
OF THE STATE OF MONTANA

REGARDING PHOENIX OPERATING LLC'S APPLICATIONS FOR PERMITS TO DRILL THE SABLE 14-23-26-35 1H, 2H, 3H, 4H OIL AND GAS WELLS IN A SPACING UNIT COMPRISED OF ALL OF SECTIONS 14, 23, 26, 35 TOWNSHIP 27 NORTH, RANGE 55 EAST, RICHLAND COUNTY, MONTANA

MBOGC Docket No.

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

RECEIVED
MAR 02 2026
MONTANA BOARD OF OIL & GAS CONSERVATION • BILLINGS

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

Continental has submitted a fully completed application for the Mako 1-14H to be drilled in the spacing unit comprised of Sections 14, 23, 26, 35, Township 27 North, Range 55 East, Richland County, Montana. It is our belief that Continental was the first to file a fully completed application pursuant to the Board's regulations, including compliance with A.R.M. 36.22.601(1)(b). Continental owns a 47% interest in said spacing unit.

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

By contrast, Phoenix has drilled and completed 9 total wells in Montana, none of which are four-mile laterals. Phoenix's development approach emphasizes near term production, resulting in royalty income that largely reflects commodity prices immediately following drilling—prices that have recently been low to moderate—rather than a coordinated development strategy structured to maximize ultimate recovery. Phoenix realizes the short-term benefits of batch drilling while mineral owners bear the corresponding disadvantage of reduced ultimate recovery and royalty income tied to suboptimal timing.

237-2026

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

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

Continental respectfully requests the following relief:

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

2. After hearing the matter, the Board enter its order denying the Phoenix permits.

3. For such other relief as the Board may deem appropriate.

Dated March 2nd, 2026.

CONTINENTAL RESOURCES INC.

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

RECEIVED
MAR 02 2026
237-2026 MONTANA BOARD OF OIL & GAS CONSERVATION • BILLINGS

CERTIFICATE OF SERVICE

I hereby certify that that on the 2nd day of March 2026, I served a true and correct copy of the foregoing document to the following:

[X] U.S. Mail	Phoenix Operating LLC
[ ] Facsimile	4643 S Ulster, Ste 1510
[ ] FedEx	Denver, CO 80237
[ ] E-mail	
[ ] Hand delivery	With a copy sent via email to Phoenix's legal counsel Wendy Johnson at: wjohnson@kmd.law

[ ] U.S. Mail	Ben Jones
[ ] Facsimile	Administrator
[ ] FedEx	MBOGC
[ ] E-mail	2535 St. Johns Ave.
[X] Hand delivery	Billings, MT 59102

Scotti Gray

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MAR 02 2026
MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

237-2026

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

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

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

In the Matter of the application of
SABLE 14-23-26-35 1H
by Phoenix Operating LLC
for a Permit to Drill an oil and gas well.

1. Name and address of Applicant: Phoenix Operating LLC
4643 S Ulster, Ste 1510
Denver, CO 80237

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

Surface Location at 400' FNL and 877' FWL in NWNW,
Section 14, Township 27 North, Range 55 East, Richland County, Montana.

Bottom Hole Location at 240' FSL and 550' FWL in SWSW,
Section 35, Township 27 North, Range 55 East, Richland County, Montana.

3. Total Depth Proposed to be Drilled:
30766' Measured Depth, 9719' Total Vertical Depth

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

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

February 21, 2026 COL-MT-202225 **MNAXLP**

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MONTANA BOARD OF OIL & GAS CONSERVATION • BILLINGS

237-2026

APPLICATION FOR PERMIT TO DRILL AN OIL AND GAS WELL

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

In the Matter of the application of
SABLE 14-23-26-35 2H
by Phoenix Operating LLC
for a Permit to Drill an oil and gas well.

1. Name and address of Applicant:
Phoenix Operating LLC
4643 S Ulster, Ste 1510
Denver, CO 80237

2. Legal Description including County and Approximate Footages of Surface Location of Proposed Oil and Gas Well: (and projected bottom-hole location, if a directional or horizontal well)
Surface Location at 400' FNL and 907' FWL in NWNW, Section 14, Township 27 North, Range 55 East, Richland County, Montana.
Bottom Hole Location at 240' FSL and 1945' FWL in SESW, Section 35, Township 27 North, Range 55 East, Richland County, Montana.

3. Total Depth Proposed to be Drilled:
30847' Measured Depth, 9719' Total Vertical Depth

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

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

237-2026

February 21, 2026 COL-MT-202216 **MNAXLP**

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MONTANA BOARD OF OIL & GAS CONSERVATION • BILLINGS

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

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

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

In the Matter of the application of
SABLE 14-23-26-35 3H
by Phoenix Operating LLC
for a Permit to Drill an oil and gas well.

1. Name and address of Applicant: Phoenix Operating LLC
4643 S Ulster, Ste 1510
Denver, CO 80237

2. Legal Description including County and Approximate Footages of Surface Location of Proposed Oil and Gas Well: (and projected bottom-hole location, if a directional or horizontal well)
Surface Location at 400' FNL and 937' FWL in NWNW, Section 14, Township 27 North, Range 55 East, Richland County, Montana.
Bottom Hole Location at 240' FSL and 1945' FEL in SWSE, Section 35, Township 27 North, Range 55 East, Richland County, Montana.

3. Total Depth Proposed to be Drilled:
31179' Measured Depth, 9719' Total Vertical Depth

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

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

February 21, 2026 COL-MT-202224 **MNAXLP**

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MONTANA BOARD OF OIL & GAS CONSERVATION • BILLINGS

237-2026

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

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

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

In the Matter of the application of
SABLE 14-23-26-35 4H
by Phoenix Operating LLC
for a Permit to Drill an oil and gas well.

1. Name and address of Applicant: Phoenix Operating LLC
4643 S Ulster, Ste 1510
Denver, CO 80237

2. Legal Description including County and Approximate Footages of Surface Location of Proposed Oil and Gas Well: (and projected bottom-hole location, if a directional or horizontal well)
Surface Location at 400' FNL and 967' FWL in NWNW,
Section 14, Township 27 North, Range 55 East, Richland County, Montana.
Bottom Hole Location at 240' FSL and 550' FEL in SESE,
Section 35, Township 27 North, Range 55 East, Richland County, Montana.

3. Total Depth Proposed to be Drilled:
31813' Measured Depth, 9719' Total Vertical Depth

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

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

February 21, 2026 COL-MT-202223 **MNAXLP**

iPhone

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MAR 02 2026
MONTANA BOARD OF OIL & GAS CONSERVATION • BILLINGS

237-2026

BOARD OF OIL AND GAS CONSERVATION OF THE STATE OF MONTANA

REGARDING PHOENIX OPERATING LLC'S APPLICATIONS FOR PERMITS TO DRILL THE CACTUS JACK 15-22-27-34 1H, 2H, 3H, 4H OIL AND GAS WELLS IN A SPACING UNIT COMPRISED OF ALL OF SECTIONS 15, 22, 27, 34 TOWNSHIP 27 NORTH, RANGE 55 EAST, RICHLAND COUNTY, MONTANA

MBOGC Docket No.

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

RECEIVED

MAR 02 2026

MONTANA BOARD OF OIL & GAS CONSERVATION • BILLINGS

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

Continental has submitted a fully completed application for the Great White 1-15H to be drilled in the spacing unit comprised of Sections 15, 22, 27, 34, Township 27 North, Range 55 East, Richland County, Montana. It is our belief that Continental was the first to file a fully completed application pursuant to the Board's regulations, including compliance with A.R.M. 36.22.601(1)(b). Continental owns a 54% interest in said spacing unit.

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

By contrast, Phoenix has drilled and completed 9 total wells in Montana, none of which are four-mile laterals. Phoenix's development approach emphasizes near term production, resulting in royalty income that largely reflects commodity prices immediately following drilling—prices that have recently been low to moderate—rather than a coordinated development strategy structured to maximize ultimate recovery. Phoenix realizes the short-term benefits of batch drilling while mineral owners bear the corresponding disadvantage of reduced ultimate recovery and royalty income tied to suboptimal timing.

238-2026

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

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

Continental respectfully requests the following relief:

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

2. After hearing the matter, the Board enter its order denying the Phoenix permits.

3. For such other relief as the Board may deem appropriate.

Dated March 2nd, 2026.

CONTINENTAL RESOURCES INC.

By Scotti Gray

Scotti Gray
(406) 248-4141
Attorney for Applicant

RECEIVED
MAR 02 2026
MONTANA BOARD OF OIL & GAS CONSERVATION • BILLINGS

238-2026

CERTIFICATE OF SERVICE

I hereby certify that that on the 2nd day of March 2026, I served a true and correct copy of the foregoing document to the following:

[X] U.S. Mail	Phoenix Operating LLC
[ ] Facsimile	4643 S Ulster, Ste 1510
[ ] FedEx	Denver, CO 80237
[ ] E-mail	
[ ] Hand delivery	With a copy sent via email to Phoenix's legal counsel Wendy Johnson at: wjohnson@kmd.law

[ ] U.S. Mail	Ben Jones
[ ] Facsimile	Administrator
[ ] FedEx	MBOGC
[ ] E-mail	2535 St. Johns Ave.
[X] Hand delivery	Billings, MT 59102

Scotti Gray

Scotti Gray

RECEIVED

MAR 02 2026

3238-2026 MONTANA BOARD OF OIL & GAS CONSERVATION • BILLINGS

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

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

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

In the Matter of the application of CACTUS JACK 15-22-27-34 1H by Phoenix Operating LLC

for a Permit to Drill an oil and gas well.

1. Name and address of Applicant: Phoenix Operating LLC
4643 S Ulster, Ste 1510
Denver, CO 80237

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

Surface Location at 351' FNL and 2309' FEL in NWNE, Section 15, Township 27 North, Range 55 East, Richland County, Montana.

Bottom Hole Location at 240' FSL and 550' FWL in SWSW, Section 34, Township 27 North, Range 55 East, Richland County, Montana.

3. Total Depth Proposed to be Drilled:
31176' Measured Depth, 9699' Total Vertical Depth

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

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

February 21, 2026 COL-MT-202222 **MNAXLP**

RECEIVED
MAR 02 2026
MONTANA BOARD OF OIL AND GAS CONSERVATION
238-2026

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

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

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

In the Matter of the application of CACTUS JACK 15-22-27-34 2H by Phoenix Operating LLC
for a Permit to Drill an oil and gas well.

1. Name and address of Applicant: Phoenix Operating LLC
4643 S Ulster, Ste 1510
Denver, CO 80237

2. Legal Description including County and Approximate Footages of Surface Location of Proposed Oil and Gas Well: (and projected bottom-hole location, if a directional or horizontal well)
Surface Location at 351' FNL and 2279' FEL in NWNE,
Section 15, Township 27 North, Range 55 East, Richland County, Montana.
Bottom Hole Location at 240' FSL and 1945' FWL in SESW,
Section 34, Township 27 North, Range 55 East, Richland County, Montana.

3. Total Depth Proposed to be Drilled:
30806' Measured Depth, 9699' Total Vertical Depth

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

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

February 21, 2026 COL-MT-202217 **MNAXLP**

RECEIVED
MAR 02 2026
MONTANA BOARD OF OIL & GAS CONSERVATION • BILLINGS
238-2026

APPLICATION FOR PERMIT TO DRILL AN OIL AND GAS WELL

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

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

In the Matter of the application of CACTUS JACK 15-22-27-34 3H by Phoenix Operating LLC

for a Permit to Drill an oil and gas well.

1. Name and address of Applicant: Phoenix Operating LLC
4643 S Ulster, Ste 1510
Denver, CO 80237

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

Surface Location at 351' FNL and 2249' FEL in NWNE, Section 15, Township 27 North, Range 55 East, Richland County, Montana.

Bottom Hole Location at 240' FSL and 1945' FEL in SWSE, Section 34, Township 27 North, Range 55 East, Richland County, Montana.

3. Total Depth Proposed to be Drilled:
30732' Measured Depth, 9699' Total Vertical Depth

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

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

February 21, 2026 COL-MT-202227 **MNAXLP**

RECEIVED
MAR 02 2026
MONTANA BOARD OF OIL & GAS CONSERVATION • BILLINGS
238-2026

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

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

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

In the Matter of the application of CACTUS JACK 15-22-27-34 4H by Phoenix Operating LLC
for a Permit to Drill an oil and gas well.

1. Name and address of Applicant: Phoenix Operating LLC
4643 S Ulster, Ste 1510
Denver, CO 80237

2. Legal Description including County and Approximate Footages of Surface Location of Proposed Oil and Gas Well:
(and projected bottom-hole location, if a directional or horizontal well)
Surface Location at 351' FNL and 2219' FEL in NWNE,
Section 15, Township 27 North, Range 55 East, Richland County, Montana.
Bottom Hole Location at 240' FSL and 550' FEL in SESE,
Section 34, Township 27 North, Range 55 East, Richland County, Montana.

3. Total Depth Proposed to be Drilled:
30947' Measured Depth, 9699' Total Vertical Depth

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

Montana Board of Oil and Gas Conservation 2535 St. Johns Avenue
Billings MT 59102
Office: (406) 656-0040
Fax: (406) 655-6015
February 21, 2026 COL-MT-202226 **MNAXLP**

RECEIVED
MAR 02 2026
MONTANA BOARD OF OIL & GAS CONSERVATION • BILLINGS

238-2026

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 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.

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

MBOGC Docket No. 265-2026

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 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
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. 266-2026

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
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.

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.

MBOGC Docket No. 267-2026

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 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
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.

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 ADDITONAL WELLS IN THE SPACING UNIT COMPRISED OF 18 AND 19, T26N, R55E BE VACATED.

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 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

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.

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

MBOGC Docket No. 271-2026

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 Sections 26 and 35, Township 26 North, Range 55 East, and Sections 2 and 11, Township 25 North, Ragne 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, Ragne 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, Ragne 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.

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

MBOGC Docket No. 273-2026

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 Sections 27 and 34, Township 26 North, Range 55 East, and Sections 3 and 10, Township 25 North, Ragne 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, Ragne 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, Ragne 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

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

Scotti Gray
Attorney for Applicant

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 4th 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

****

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 4th 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

****

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 4th 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

****

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 4th 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

****

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 4th 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**

****

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 4th 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

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

****

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 Sveet #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 Sveet #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 Sveet #31-29H well; and **(iii)** vacating MBOGC Order No. 59-2010.

DATED this 4th 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

****

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 4th 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

****

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 4th 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

****

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 4th 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

****

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/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 (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 4th 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

****

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.

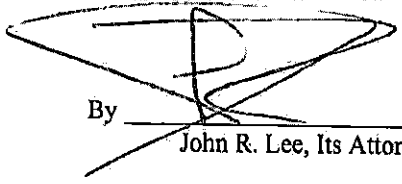
[B] Requests:

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 4th 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 PHOENIX OPERATING LLC, FOR AN ORDER CREATING A TEMPORARY SPACING UNIT ("TSU") COMPRISED OF ALL OF SECTIONS 23, 26, 35, 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' (HEEL/TOE SETBACK)/500' (LATERAL SETBACK) TO THE BOUNDARIES OF SAID TSU, VACATING MBOGC ORDER NOS. 380-2011, 71-2010, AND 294-2011, AND SUCH OTHER AND FURTHER RELIEF AS THE MBOGC MAY DEEM APPROPRIATE.	**MBOGC DOCKET NO.** 316-2026 **APPLICATION**

******

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 23, 26, 35, Township 26 North, Range 55 East, Richland County, Montana (the "Application Lands").
2. Sections 26 and 35, Township 26 North, Range 55 East, Richland County, are subject to the areawide state spacing order for Bakken/Three Forks production, MBOGC Order No. 380-2011.
3. Section 23, Township 26 North, Range 55 East, Richland County, is subject to MBOGC Order No. 71-2010, as amended by MBOGC Order No. 294-2011.
4. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the Application 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 all of Sections 23, 26, 35, Township 26 North, Range 55 East, Richland County, Montana.
5. To grant the requested relief, it will be necessary to vacate MBOGC Order Nos. 71-2010 and 294-2011 and MBOGC Order No. 380-2011, as applicable to Sections 26 and 35, Township 26 North, Range 55 East, Richland County, and to terminate the temporary spacing units created thereby.
6. 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.

7. Applicant will, within ninety (90) days of successful completion of the proposed horizontal operation, file an application for the Board's consideration of permanent spacing and other matters relating to production from said wells.

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 (i) creating a TSU comprised of all of Sections 23, 26, 35, Township 26 North, Range 55 East, 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. 71-2010 and 294-2011; and (iii) vacating MBOGC Order No. 380-2011, insofar as applicable to Sections 26 and 35, Township 26 North, Range 55 East, Richland County; and
3. For such other or additional relief as the Board 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

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

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 23, 26, 35, TOWNSHIP 26 NORTH, RANGE 55 EAST, RICHLAND COUNTY, MONTANA, AT ANY LOCATIONS NOT CLOSER THAN 200' (HEEL/TOE SETBACK)/500' (LATERAL SETBACK) TO THE BOUNDARIES OF SAID TSU, AND SUCH OTHER AND FURTHER RELIEF AS MBOGC MAY DEEM APPROPRIATE.	**MBOGC DOCKET NO.** 317-2026 **APPLICATION**

******

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 23, 26, 35, Township 26 North, Range 55 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 ("MBOGC" and the "Board") Order No. _____ - 2026.
2. Applicant requests authorization from the Board to drill up to three additional horizontal Bakken/Three Forks formation wells within said TSU, at any location 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.

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 said TSU, at any location but not closer than 200' (heel/toe setback)/ 500' (lateral setback) to the exterior boundaries of a TSU comprised of all of Sections 23, 26, 35, Township 26 North, Range 55 East, Richland County, Montana, Montana; and
3. For such other or additional relief as the Board 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

CROWLEY | FLECK
ATTORNEYS

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

February 5, 2026

E-MAIL AND FAX

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

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

Dear Ben:

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

Please do not hesitate to call if you have questions.

Regards,

Uriah J. Price

331-2026

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

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

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

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

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

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

2. That after hearing the Board enter an Order denying Phoenix's permits.

3. For such other relief as the Board may deem appropriate.

Dated this 5th day of February, 2026.

Kraken Oil & Gas LLC

By _____
Uriah J. Price, Its Attorney

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

331-2026

CERTIFICATE OF SERVICE

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

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

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

By Certified Mail to:
Phoenix Operating LLC
4643 S Ulster, Ste 1510
Denver, CO 80237

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

By: _____
Uriah J. Price

331-2026

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

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

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

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

1. Name and address of Applicant:
Phoenix Operating LLC
4643 S Ulster, Ste 1510
Denver, CO 80237

2. Legal Description including County and Approximate Footages of Surface Location of Proposed Oil and Gas Well: (and projected bottom-hole location, if a directional or horizontal well)
Surface Location at 2596' FNL and 500' FWL in SWNW, Section 15, Township 23 North, Range 59 East, Richland County, Montana.
Bottom Hole Location at 550' FNL and 240' FEL in Lot 1, Section 17, Township 23 North, Range 60 East, Richland County, Montana.

3. Total Depth Proposed to be Drilled:
34549' Measured Depth, 10158' Total Vertical Depth

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

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

January 29, 2026 COL-MT-202110 **MNAXLP**

331-2026

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

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

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

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

1. Name and address of Applicant:
Phoenix Operating LLC
4643 S Ulster, Ste 1510
Denver, CO 80237

2. Legal Description including County and Approximate Footages of Surface Location of Proposed Oil and Gas Well:
(and projected bottom-hole location, if a directional or horizontal well)
Surface Location at 2626' FNL and 500' FWL in SWNW, Section 15, Township 23 North, Range 59 East, Richland County, Montana.
Bottom Hole Location at 1945' FNL and 240' FEL in Lot 5, Section 17, Township 23 North, Range 60 East, Richland County, Montana.

3. Total Depth Proposed to be Drilled:
34261' Measured Depth, 10158' Total Vertical Depth

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

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

January 29, 2026 COL-MT-202109 **MNAXLP**

331-2026

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

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

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

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

1. Name and address of Applicant:
Phoenix Operating LLC
4643 S Ulster, Ste 1510
Denver, CO 80237

2. Legal Description including County and Approximate Footages of Surface Location of Proposed Oil and Gas Well: (and projected bottom-hole location, if a directional or horizontal well)
Surface Location at 2647' FSL and 500' FWL in NWSW, Section 15, Township 23 North, Range 59 East, Richland County, Montana.
Bottom Hole Location at 1945' FSL and 240' FEL in Lot 6, Section 17, Township 23 North, Range 60 East, Richland County, Montana.

3. Total Depth Proposed to be Drilled:
34243' Measured Depth, 10158' Total Vertical Depth

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

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

January 29, 2026 COL-MT-202106 **MNAXLP**

331-2026

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

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

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

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

1. Name and address of Applicant:
Phoenix Operating LLC
4643 S Ulster, Ste 1510
Denver, CO 80237

2. Legal Description including County and Approximate Footages of Surface Location of Proposed Oil and Gas Well: (and projected bottom-hole location if a directional or horizontal well)
Surface Location at 2617' FSL and 500' FWL in NWSW, Section 15, Township 23 North, Range 59 East, Richland County, Montana.
Bottom Hole Location at 550' FSL and 240' FEL in Lot 7, Section 17, Township 23 North, Range 60 East, Richland County, Montana.

3. Total Depth Proposed to be Drilled:
34516' Measured Depth, 10158' Total Vertical Depth

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

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

January 29, 2026 COL-MT-202107 **MNAXLP**

331-2026

Published in Helena Independent Record on February 7, 2026

Location

Lewis and Clark County, Montana

Notice Text

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

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

for a Permit to Drill an oil and gas well.

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

1. Name and address of Applicant:
Phoenix Operating LLC
4643 S Ulster, Ste 1510
Denver, CO 80237
2. Legal Description including County and Approximate Footages of Surface Location of Proposed Oil and Gas Well (and projected bottom-hole location, if a directional or horizontal well):
Surface Location at 2477' FNL and 450' FWL in SWNW, Section 15, Township 23 North, Range 59 East, Richland County, Montana.
Bottom Hole Location at 550' FNL and 240' FEL in Lot 1, Section 17, Township 23 North, Range 60 East, Richland County, Montana.
3. Total Depth Proposed to be Drilled:
34508' Measured Depth, 10158' Total Vertical Depth

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

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

February 7, 2026 COL-MT-202142 **MNAXLP**

331-2026

Published in Helena Independent Record on February 7, 2026

Location

Lewis and Clark County, Montana

Notice Text

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

In the Matter of the application of
BAILIAN 15-14-13-18-17 2H
by Phoenix Operating LLC

for a Permit to Drill an oil and gas well.

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

1. Name and address of Applicant:
Phoenix Operating LLC
4643 S Ulster, Ste 1510
Denver, CO 80237
2. Legal Description including County and Approximate Footages of Surface Location of Proposed Oil and Gas Well
(and projected bottom-hole location, if a directional or horizontal well)
Surface Location at 2507' FNL and 450' FWL in SWNW, Section 15, Township 23 North, Range 59 East, Richland County, Montana.
Bottom Hole Location at 1945' FNL and 240' FEL in Lot 5, Section 17, Township 23 North, Range 60 East, Richland County, Montana.
3. Total Depth Proposed to be Drilled:
34244' Measured Depth, 10158' Total Vertical Depth

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

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

February 7, 2026 COL-MT-202138 **MNAXLP**

331-2026

Published in Helena Independent Record on February 7, 2026

Location

Lewis and Clark County, Montana

Notice Text

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

In the Matter of the application of
BAILIAN 15-14-13-18-17 3H
by Phoenix Operating LLC

for a Permit to Drill an oil and gas well

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

1. Name and address of Applicant:
Phoenix Operating LLC
4643 S Ulster, Ste 1510
Denver, CO 80237

2. Legal Description including County and Approximate Footages of Surface Location of Proposed Oil and Gas Well
(and projected bottom-hole location, if a directional or horizontal well)
Surface Location at 2537' FNL and 450' FWL in SWNW,
Section 15, Township 23 North, Range 59 East, Richland County, Montana.
Bottom Hole Location at 1945' FSL and 240' FEL in Lot 6,
Section 17, Township 23 North, Range 60 East, Richland County, Montana.

3. Total Depth Proposed to be Drilled:
34251' Measured Depth, 10158' Total Vertical Depth

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

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

February 7, 2026 COL-MT-202139 **MNAXLP**

331-2026

Published in Helena Independent Record on February 7, 2026

Location

Lewis and Clark County, Montana

Notice Text

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

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

for a Permit to Drill an oil and gas well

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

1. Name and address of Applicant:
Phoenix Operating LLC
4643 S Ulster, Ste 1510
Denver, CO 80237

2. Legal Description including County and Approximate Footages of Surface Location of Proposed Oil and Gas Well
(and projected bottom-hole location, if a directional or horizontal well)
Surface Location at 2567' FNL and 450' FWL in SWNW,
Section 15, Township 23 North, Range 59 East, Richland County, Montana.
Bottom Hole Location at 550' FSL and 240' FEL in Lot 7,
Section 17, Township 23 North, Range 60 East, Richland County, Montana.

3. Total Depth Proposed to be Drilled:
34548' Measured Depth, 10158' Total Vertical Depth

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

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

February 7, 2026 COL-MT-202141 **MNAXLP**

331-2026

FAX COVER SHEET

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

COVER MESSAGE

Dear Mr. Jones:

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

Please do not hesitate to call if you have questions.

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

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MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

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KLH ADVISORS PLLC

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

March 24, 2026

E-MAIL AND FAX

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

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

Dear Mr. Jones:

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

Please do not hesitate to call if you have questions.

Sincerely,

Kelley Hiesmoeller Lewis

Kelley Lewis

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MAR 24 2026
MONTANA BOARD OF OIL AND GAS CONSERVATION

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

335-2026

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

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

******

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

1. The Montana Board of Oil and Gas Conservation ("MBOGC" and the "Board") established a temporary spacing unit comprised of Sections 14, 23, 26, and 35, Township 27 North, Range 55 East, Richland County, Montana, under MBOGC Order No. 043-2026 ("TSU").

2. Phoenix was the first operator to file a completed application for permit to drill within the TSU ("Phoenix APD") pursuant to the Board's regulations, and published notice of the Phoenix APD in the Helena Independent on February 21, 2026, and in the Sidney Herald on February 21, 2026.

3. To the extent that the MBOGC examines other factors in determining operatorship, Phoenix owns 28.0962383% of the working interest in Sections 14, 23, 26, and 35, Township 27 North, Range 55 East, Richland County. Phoenix plans to develop the underlying pool in an orderly manner alongside other development in the area. Continental's APD fails to adequately provide for correlative rights or promote maximum efficient recovery of oil and gas in the State of Montana.

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MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

335-2026

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

WHEREFORE, Phoenix respectfully requests the following relief:

1. That the Continental APD be referred to the MBOGC for notice and public hearing as required by A.R.M. § 36.22.601(4)(a);

2. That after hearing the MBOGC enter an Order denying Continental's APD,

3. The MBOGC enter an Order granting Phoenix's Application for Permit to Drill in the TSU; and

4. For such other relief as the MBOGC may deem appropriate.

DATED this 24th day of March 2026.

PHOENIX OPERATING LLC

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

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MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

335-2026

CERTIFICATE OF SERVICE

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

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

Continental Resources, Inc.
P.O. Box 268870
Oklahoma City, Oklahoma 73126
Fax No. (405) 234-9562
Via Fax, with a copy sent via certified mail.

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

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MAR 24 2026
MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS

335-2026

Notice of Application

Published in Helena Independent Record on March 12, 2026

Location

Lewis and Clark County, Montana

Notice Text

Mako 1-14H
BEFORE THE BOARD OF OIL AND GAS CONSERVATION
OF THE STATE OF MONTANA
NOTICE OF INTENTION TO APPLY FOR PERMIT TO DRILL AN OIL AND GAS WELL
In the Matter of the Application of CONTINENTAL RESOURCES, INC. for a Permit to Drill a horizontal oil and gas well.
Name and Address of Applicant: Continental Resources, Inc.
P.O. Box 268870
Oklahoma City, Oklahoma 73126
(405) 234-9000 fax (405) 234-9562
Well Name and Legal Description: Mako 1-14H
Surface Hole Location: 501'FNL & 2201' FWL, NENW Sec 14-27N-55E
Horizontal Intercept: 615' FNL & 598' FWL, NWNW Sec 14-27N-55E
Horizontal Terminus: 200 FSL & 660 FWL, SWSW Sec 35-27N-55E
County: Richland
Proposed Total Depth: (1) 30624 MD; 9728 TVD
Notice is hereby given that an application for permit to drill an oil and gas well at the surface location set forth above to the depth as stated will be filed with the Montana Board of Oil and Gas Conservation. Pursuant to Rules 36.22.601 and 36.22.604, Administrative Rules of Montana, an interested party may demand an opportunity to be heard by the Montana Board of Oil and Gas Conservation concerning the application. SUCH DEMAND FOR HEARING MUST BE RECEIVED BY THE MONTANA BOARD OF OIL AND GAS CONSERVATION AT THE ADDRESS SET FORTH NO LATER THAN TEN (10) DAYS AFTER THE DATE OF PUBLICATION OF THIS NOTICE, OR THE APPLICATION WILL BE ACTED UPON BY THE BOARD'S PETROLEUM ENGINEER WITHOUT HEARING. A DEMAND MUST: (1) SET FORTH THE NAME, ADDRESS AND TELEPHONE NUMBER OF EACH INTERESTED PARTY, THEIR OWNERSHIP INTEREST IN THE LANDS SURROUNDING THE PROPOSED WELL, AND THE REASONS WHY THE HEARING IS SOUGHT; (2) BE SERVED UPON THE APPLICANT BY COPY MAILED OR FAX TRANSMITTED TO THE ADDRESS SET FORTH ABOVE.
Montana Board of Oil and Gas Conservation
2535 St. John s Avenue
Billings, Montana 59102
FAX Number: (406) 655-6015
March 12, 2026 COL-MT-202356 **MNAXLP**

RECEIVED
MAR 24 2026
MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS
335-2026

Notice of Application

Published in Sidney Herald on March 14, 2026

Location

Richland County, Montana

Notice Text

Mako 1-14H
BEFORE THE BOARD OF OIL AND GAS CONSERVATION
OF THE STATE OF MONTANA
NOTICE OF INTENTION TO APPLY FOR PERMIT TO DRILL
AN OIL AND GAS WELL
In the Matter of the Application of CONTINENTAL RESOURCES, INC. for a Permit to Drill a horizontal oil and gas well.
Name and Address of Applicant: Continental Resources, Inc.
P.O. Box 268870
Oklahoma City, Oklahoma 73126
(405) 234-9000 fax (405) 234-9562
Well Name and Legal Description: Mako 1-14H
Surface Hole Location: 501' FNL & 2201' FWL, NENW Sec 14-27N-55E
Horizontal Intercept : 615' FNL & 598' FWL, NWNW Sec 14-27N-55E
Horizontal Terminus: 200 FSL & 660 FWL, SWSW Sec 35-27N-55E
County: Richland
Proposed Total Depth: (1) 30624 MD; 9728 TVD
Notice is hereby given that an application for permit to drill an oil and gas well at the surface location set forth above to the depth as stated will be filed with the Montana Board of Oil and Gas Conservation. Pursuant to Rules 36.22.601 and 36.22.604, Administrative Rules of Montana, an interested party may demand an opportunity to be heard by the Montana Board of Oil and Gas Conservation concerning the application. SUCH DEMAND FOR HEARING MUST BE RECEIVED BY THE MONTANA BOARD OF OIL AND GAS CONSERVATION AT THE ADDRESS SET FORTH NO LATER THAN TEN (10) DAYS AFTER THE DATE OF PUBLICATION OF THIS NOTICE, OR THE APPLICATION WILL BE ACTED UPON BY THE BOARD'S PETROLEUM ENGINEER WITHOUT HEARING. A DEMAND MUST: (1) SET FORTH THE NAME, ADDRESS AND TELEPHONE NUMBER OF EACH INTERESTED PARTY, THEIR OWNERSHIP INTEREST IN THE LANDS SURROUNDING THE PROPOSED WELL, AND THE REASONS WHY THE HEARING IS SOUGHT; (2) BE SERVED UPON THE APPLICANT BY COPY MAILED OR FAX TRANSMITTED TO THE ADDRESS SET FORTH ABOVE.
Montana Board of Oil and Gas Conservation
2535 St. John s Avenue
Billings, Montana 59102
FAX Number: (406) 655-6015
Date: March 14, 2026
SHM000808

RECEIVED
MAR 24 2026
MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS
335-2026

BOARD OF OIL AND GAS CONSERVATION
OF THE STATE OF MONTANA

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

MBOGC Docket No.

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

RECEIVED
MAR 26 2026
MONTANA BOARD OF OIL & GAS CONSERVATION • BILLINGS

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

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

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

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

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

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

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

Continental respectfully requests the following relief:

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

2. After hearing the matter, the Board enter its order denying the Phoenix permits.

3. For such other relief as the Board may deem appropriate.

Dated March 26th, 2026.

CONTINENTAL RESOURCES INC.

By Scotti Gray

Scotti Gray
(406) 248-4141
Attorney for Applicant

RECEIVED
MAR 26 2026
MONTANA BOARD OF OIL AND GAS CONSERVATION
339-2026

CERTIFICATE OF SERVICE

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

[X] U.S. Mail	Phoenix Operating LLC
[ ] Facsimile	4643 S Ulster, Ste 1510
[ ] FedEx	Denver, CO 80237
[ ] E-mail	
[ ] Hand delivery	With a copy sent via email to Phoenix's legal counsel Kelly Lewis at: klh@klhadvisors.com

[ ] U.S. Mail	Ben Jones
[ ] Facsimile	Administrator
[ ] FedEx	MBOGC
[ ] E-mail	2535 St. Johns Ave.
[X] Hand delivery	Billings, MT 59102

Scotti Gray

Scotti Gray

RECEIVED
MAR 26 2026
MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS
339-2026

Notice of Application

Published in Helena Independent Record on March 19, 2026

Location
Lewis and Clark County, Montana
Notice Text

NOTICE OF INTENTION TO APPLY FOR PERMIT TO DRILL OIL AND GAS WELL
BEFORE THE BOARD OF OIL AND GAS CONSERVATION OF THE STATE OF MONTANA
In the Matter of the application of
SHANE FED 27-22-15-10-3 1HF
by Phoenix Operating LLC

for a Permit to Drill an oil and gas well.
1. Name and address of Applicant:
Phoenix Operating LLC
4643 S Ulster, Ste 1510
Denver, CO 80237
2. Legal Description including County and Approximate Footages of Surface Location of Proposed Oil and Gas Well: (and projected bottom-hole location, if a directional or horizontal well)
Surface Location at 313' FNL and 2091' FEL in NWNE,
Section 34, Township 26 North, Range 55 East, Richland County, Montana.
Bottom Hole Location at 240' FNL and 550' FWL in Lot 4,
Section 3, Township 26 North, Range 55 East, Richland County, Montana.
3. Total Depth Proposed to be Drilled:
36802' Measured Depth, 9987' Total Vertical Depth
Notice is hereby given that an application for permit to drill an oil and gas well at the surface location set forth above to the depth as stated will be filed with the Montana Board of Oil and Gas Conservation. Pursuant to Rules 36.22.601 and 36.22.604, Administrative Rules of Montana, an interested party may demand an opportunity to be heard by the Montana Board of Oil and Gas Conservation concerning the application. SUCH DEMAND FOR HEARING MUST BE RECEIVED BY THE MONTANA BOARD OF OIL AND GAS CONSERVATION AT THE ADDRESS SET FORTH BELOW NO LATER THAN TEN (10) DAYS AFTER THE DATE OF PUBLICATION OF THIS NOTICE, OR THE APPLICATION WILL BE ACTED UPON BY THE BOARD'S PETROLEUM ENGINEER WITHOUT HEARING. A DEMAND MUST: (1) SET FORTH THE NAME, ADDRESS AND TELEPHONE NUMBER OF EACH INTERESTED PARTY, THEIR OWNERSHIP INTEREST IN THE LANDS SURROUNDING THE PROPOSED WELL, AND THE REASONS WHY A HEARING IS SOUGHT; (2) BE SERVED UPON THE APPLICANT BY COPY MAILED OR FAX TRANSMITTED TO THE ADDRESS SET FORTH ABOVE.

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

RECEIVED
MAR 26 2026
MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS
339-2026

Notice of Application

Published in Helena Independent Record on March 19, 2026

Location
Lewis and Clark County, Montana
Notice Text

NOTICE OF INTENTION TO APPLY FOR PERMIT TO DRILL OIL AND GAS WELL
BEFORE THE BOARD OF OIL AND GAS CONSERVATION OF THE STATE OF MONTANA
In the Matter of the application of
SHANE FED 27-22-15-10-3 2HF
by Phoenix Operating LLC
for a Permit to Drill an oil and gas well.

1. Name and address of Applicant:
Phoenix Operating LLC
4643 S Ulster, Ste 1510
Denver, CO 80237
2. Legal Description including County and Approximate Footages of Surface Location of Proposed Oil and Gas Well: (and projected bottom-hole location, if a directional or horizontal well)
Surface Location at 313' FNL and 2061' FEL in NWNE,
Section 34, Township 26 North, Range 55 East, Richland County, Montana.
Bottom Hole Location at 240' FNL and 1945' FWL in Lot 3,
Section 3, Township 26 North, Range 55 East, Richland County, Montana.
3. Total Depth Proposed to be Drilled:
36400' Measured Depth, 9987' Total Vertical Depth
Notice is hereby given that an application for permit to drill an oil and gas well at the surface location set forth above to the depth as stated will be filed with the Montana Board of Oil and Gas Conservation. Pursuant to Rules 36.22.601 and 36.22.604, Administrative Rules of Montana, an interested party may demand an opportunity to be heard by the Montana Board of Oil and Gas Conservation concerning the application. SUCH DEMAND FOR HEARING MUST BE RECEIVED BY THE MONTANA BOARD OF OIL AND GAS CONSERVATION AT THE ADDRESS SET FORTH BELOW NO LATER THAN TEN (10) DAYS AFTER THE DATE OF PUBLICATION OF THIS NOTICE, OR THE APPLICATION WILL BE ACTED UPON BY THE BOARD'S PETROLEUM ENGINEER WITHOUT HEARING. A DEMAND MUST: (1) SET FORTH THE NAME, ADDRESS AND TELEPHONE NUMBER OF EACH INTERESTED PARTY, THEIR OWNERSHIP INTEREST IN THE LANDS SURROUNDING THE PROPOSED WELL, AND THE REASONS WHY A HEARING IS SOUGHT; (2) BE SERVED UPON THE APPLICANT BY COPY MAILED OR FAX TRANSMITTED TO THE ADDRESS SET FORTH ABOVE.

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

RECEIVED
MAR 26 2026
MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS
339-2026

Notice of Application

Published in Helena Independent Record on March 19, 2026

Location
Lewis and Clark County, Montana
Notice Text

NOTICE OF INTENTION TO APPLY FOR PERMIT TO DRILL OIL AND GAS WELL
BEFORE THE BOARD OF OIL AND GAS CONSERVATION OF THE STATE OF MONTANA
In the Matter of the application of
SHANE FED 27-22-15-10-3 3HF
by Phoenix Operating LLC
for a Permit to Drill an oil and gas well.

1. Name and address of Applicant:
Phoenix Operating LLC
4643 S Ulster, Ste 1510
Denver, CO 80237
2. Legal Description including County and Approximate Footages of Surface Location of Proposed Oil and Gas Well: (and projected bottom-hole location, if a directional or horizontal well)
Surface Location at 313' FNL and 2031' FEL in NWNE,
Section 34, Township 26 North, Range 55 East, Richland County, Montana.
Bottom Hole Location at 240' FNL and 1945' FEL in Lot 2,
Section 3, Township 26 North, Range 55 East, Richland County, Montana.
3. Total Depth Proposed to be Drilled:
36289' Measured Depth, 9987' Total Vertical Depth
Notice is hereby given that an application for permit to drill an oil and gas well at the surface location set forth above to the depth as stated will be filed with the Montana Board of Oil and Gas Conservation. Pursuant to Rules 36.22.601 and 36.22.604, Administrative Rules of Montana, an interested party may demand an opportunity to be heard by the Montana Board of Oil and Gas Conservation concerning the application. SUCH DEMAND FOR HEARING MUST BE RECEIVED BY THE MONTANA BOARD OF OIL AND GAS CONSERVATION AT THE ADDRESS SET FORTH BELOW NO LATER THAN TEN (10) DAYS AFTER THE DATE OF PUBLICATION OF THIS NOTICE, OR THE APPLICATION WILL BE ACTED UPON BY THE BOARD'S PETROLEUM ENGINEER WITHOUT HEARING. A DEMAND MUST: (1) SET FORTH THE NAME, ADDRESS AND TELEPHONE NUMBER OF EACH INTERESTED PARTY, THEIR OWNERSHIP INTEREST IN THE LANDS SURROUNDING THE PROPOSED WELL, AND THE REASONS WHY A HEARING IS SOUGHT; (2) BE SERVED UPON THE APPLICANT BY COPY MAILED OR FAX TRANSMITTED TO THE ADDRESS SET FORTH ABOVE.

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

RECEIVED
MAR 26 2026
MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS
339-2026

Notice of Application

Published in Helena Independent Record on March 19, 2026

Location
Lewis and Clark County, Montana
Notice Text

NOTICE OF INTENTION TO APPLY FOR PERMIT TO DRILL OIL AND GAS WELL
BEFORE THE BOARD OF OIL AND GAS CONSERVATION OF THE STATE OF MONTANA
In the Matter of the application of
SHANE FED 27-22-15-10-3 4HF
by Phoenix Operating LLC
for a Permit to Drill an oil and gas well.

1. Name and address of Applicant:
Phoenix Operating LLC
4643 S Ulster, Ste 1510
Denver, CO 80237
2. Legal Description including County and Approximate Footages of Surface Location of Proposed Oil and Gas Well: (and projected bottom-hole location, if a directional or horizontal well)
Surface Location at 313' FNL and 2001' FEL in NWNE,
Section 34, Township 26 North, Range 55 East, Richland County, Montana.
Bottom Hole Location at 240' FNL and 550' FEL in Lot 1,
Section 3, Township 26 North, Range 55 East, Richland County, Montana.
3. Total Depth Proposed to be Drilled:
36441' Measured Depth, 9987' Total Vertical Depth
Notice is hereby given that an application for permit to drill an oil and gas well at the surface location set forth above to the depth as stated will be filed with the Montana Board of Oil and Gas Conservation. Pursuant to Rules 36.22.601 and 36.22.604, Administrative Rules of Montana, an interested party may demand an opportunity to be heard by the Montana Board of Oil and Gas Conservation concerning the application. SUCH DEMAND FOR HEARING MUST BE RECEIVED BY THE MONTANA BOARD OF OIL AND GAS CONSERVATION AT THE ADDRESS SET FORTH BELOW NO LATER THAN TEN (10) DAYS AFTER THE DATE OF PUBLICATION OF THIS NOTICE, OR THE APPLICATION WILL BE ACTED UPON BY THE BOARD'S PETROLEUM ENGINEER WITHOUT HEARING. A DEMAND MUST: (1) SET FORTH THE NAME, ADDRESS AND TELEPHONE NUMBER OF EACH INTERESTED PARTY, THEIR OWNERSHIP INTEREST IN THE LANDS SURROUNDING THE PROPOSED WELL, AND THE REASONS WHY A HEARING IS SOUGHT; (2) BE SERVED UPON THE APPLICANT BY COPY MAILED OR FAX TRANSMITTED TO THE ADDRESS SET FORTH ABOVE.

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

RECEIVED
MAR 26 2026
MONTANA BOARD OF O & G
GAS CONSERVATION • BILLINGS
339-2026

BOARD OF OIL AND GAS CONSERVATION
OF THE STATE OF MONTANA

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

MBOGC Docket No.

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

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

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

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

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

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MONTANA BOARD OF OIL & GAS CONSERVATION • BILLINGS

341-2026

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

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

Continental respectfully requests the following relief:

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

2. After hearing the matter, the Board enter its order denying the Phoenix permits.

3. For such other relief as the Board may deem appropriate.

Dated March 26th, 2026.

CONTINENTAL RESOURCES INC.

By _____

Scotti Gray
(406) 248-4141
Attorney for Applicant

RECEIVED
MAR 26 2026
MONTANA BOARD OF OIL & GAS CONSERVATION • BILLINGS

341-2026

CERTIFICATE OF SERVICE

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

[X] U.S. Mail	Phoenix Operating LLC
[ ] Facsimile	4643 S Ulster, Ste 1510
[ ] FedEx	Denver, CO 80237
[ ] E-mail	
[ ] Hand delivery	With a copy sent via email to Phoenix's legal counsel Kelly Lewis at: klh@klhadvisors.com

[ ] U.S. Mail	Ben Jones
[ ] Facsimile	Administrator
[ ] FedEx	MBOGC
[ ] E-mail	2535 St. Johns Ave.
[X] Hand delivery	Billings, MT 59102

Scotti Gray

Scotti Gray

RECEIVED

MAR 26 2026

MONTANA BOARD OF OIL & GAS CONSERVATION • BILLINGS

341-2026

Notice of Application

Published in Helena Independent Record on March 26, 2026

Location
Lewis and Clark County, Montana
Notice Text

NOTICE OF INTENTION TO APPLY FOR PERMIT TO DRILL OIL AND GAS WELL
BEFORE THE BOARD OF OIL AND GAS CONSERVATION OF THE STATE OF MONTANA
In the Matter of the application of
OUTLAW 23-26-35 1HF
by Phoenix Operating LLC
for a Permit to Drill an oil and gas well.

1. Name and address of Applicant:
Phoenix Operating LLC
4643 S Ulster, Ste 1510
Denver, CO 80237
2. Legal Description including County and Approximate Footages of Surface Location of Proposed Oil and Gas Well: (and projected bottom-hole location, if a directional or horizontal well)
Surface Location at 846' FNL and 1918' FEL in NWNE,
Section 23, Township 26 North, Range 55 East, Richland County, Montana.
Bottom Hole Location at 240' FSL and 550' FWL in SWSW,
Section 35, Township 26 North, Range 55 East, Richland County, Montana.
3. Total Depth Proposed to be Drilled:
26303' Measured Depth, 9934' Total Vertical Depth
Notice is hereby given that an application for permit to drill an oil and gas well at the surface location set forth above to the depth as stated will be filed with the Montana Board of Oil and Gas Conservation. Pursuant to Rules 36.22.601 and 36.22.604, Administrative Rules of Montana, an interested party may demand an opportunity to be heard by the Montana Board of Oil and Gas Conservation concerning the application. SUCH DEMAND FOR HEARING MUST BE RECEIVED BY THE MONTANA BOARD OF OIL AND GAS CONSERVATION AT THE ADDRESS SET FORTH BELOW NO LATER THAN TEN (10) DAYS AFTER THE DATE OF PUBLICATION OF THIS NOTICE, OR THE APPLICATION WILL BE ACTED UPON BY THE BOARD'S PETROLEUM ENGINEER WITHOUT HEARING. A DEMAND MUST: (1) SET FORTH THE NAME, ADDRESS AND TELEPHONE NUMBER OF EACH INTERESTED PARTY, THEIR OWNERSHIP INTEREST IN THE LANDS SURROUNDING THE PROPOSED WELL, AND THE REASONS WHY A HEARING IS SOUGHT; (2) BE SERVED UPON THE APPLICANT BY COPY MAILED OR FAX TRANSMITTED TO THE ADDRESS SET FORTH ABOVE.

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

RECEIVED
MAR 26 2026
MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS
34 1 - 2026

Notice of Application

Published in Helena Independent Record on March 26, 2026

Location
Lewis and Clark County, Montana
Notice Text

NOTICE OF INTENTION TO APPLY FOR PERMIT TO DRILL OIL AND GAS WELL
BEFORE THE BOARD OF OIL AND GAS CONSERVATION OF THE STATE OF MONTANA
In the Matter of the application of
OUTLAW 23-26-35 2HF
by Phoenix Operating LLC
for a Permit to Drill an oil and gas well.

1. Name and address of Applicant:
Phoenix Operating LLC
4643 S Ulster, Ste 1510
Denver, CO 80237
2. Legal Description including County and Approximate Footages of Surface Location of Proposed Oil and Gas Well: (and projected bottom-hole location, if a directional or horizontal well)
Surface Location at 846' FNL and 1888' FEL in NWNE,
Section 23, Township 26 North, Range 55 East, Richland County, Montana.
Bottom Hole Location at 240' FSL and 1945' FWL in SESW,
Section 35, Township 26 North, Range 55 East, Richland County, Montana.
3. Total Depth Proposed to be Drilled:
25874' Measured Depth, 9934' Total Vertical Depth
Notice is hereby given that an application for permit to drill an oil and gas well at the surface location set forth above to the depth as stated will be filed with the Montana Board of Oil and Gas Conservation. Pursuant to Rules 36.22.601 and 36.22.604, Administrative Rules of Montana, an interested party may demand an opportunity to be heard by the Montana Board of Oil and Gas Conservation concerning the application. SUCH DEMAND FOR HEARING MUST BE RECEIVED BY THE MONTANA BOARD OF OIL AND GAS CONSERVATION AT THE ADDRESS SET FORTH BELOW NO LATER THAN TEN (10) DAYS AFTER THE DATE OF PUBLICATION OF THIS NOTICE, OR THE APPLICATION WILL BE ACTED UPON BY THE BOARD'S PETROLEUM ENGINEER WITHOUT HEARING. A DEMAND MUST: (1) SET FORTH THE NAME, ADDRESS AND TELEPHONE NUMBER OF EACH INTERESTED PARTY, THEIR OWNERSHIP INTEREST IN THE LANDS SURROUNDING THE PROPOSED WELL, AND THE REASONS WHY A HEARING IS SOUGHT; (2) BE SERVED UPON THE APPLICANT BY COPY MAILED OR FAX TRANSMITTED TO THE ADDRESS SET FORTH ABOVE.

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

RECEIVED
MAR 26 2026
MONTANA BOARD OF O[illegible] &
GAS CONSERVATION - B[illegible]
34 1-2026

Notice of Application

Published in Helena Independent Record on March 26, 2026

Location
Lewis and Clark County, Montana
Notice Text

NOTICE OF INTENTION TO APPLY FOR PERMIT TO DRILL OIL AND GAS WELL
BEFORE THE BOARD OF OIL AND GAS CONSERVATION OF THE STATE OF MONTANA
In the Matter of the application of
OUTLAW FED 23-26-35 3HF
by Phoenix Operating LLC
for a Permit to Drill an oil and gas well.

1. Name and address of Applicant:
Phoenix Operating LLC
4643 S Ulster, Ste 1510
Denver, CO 80237
2. Legal Description including County and Approximate Footages of Surface Location of Proposed Oil and Gas Well: (and projected bottom-hole location, if a directional or horizontal well)
Surface Location at 846' FNL and 1858' FEL in NWNE,
Section 23, Township 26 North, Range 55 East, Richland County, Montana.
Bottom Hole Location at 240' FSL and 1945' FEL in SWSE,
Section 35, Township 26 North, Range 55 East, Richland County, Montana.
3. Total Depth Proposed to be Drilled:
25686' Measured Depth, 9934' Total Vertical Depth
Notice is hereby given that an application for permit to drill an oil and gas well at the surface location set forth above to the depth as stated will be filed with the Montana Board of Oil and Gas Conservation. Pursuant to Rules 36.22.601 and 36.22.604, Administrative Rules of Montana, an interested party may demand an opportunity to be heard by the Montana Board of Oil and Gas Conservation concerning the application. SUCH DEMAND FOR HEARING MUST BE RECEIVED BY THE MONTANA BOARD OF OIL AND GAS CONSERVATION AT THE ADDRESS SET FORTH BELOW NO LATER THAN TEN (10) DAYS AFTER THE DATE OF PUBLICATION OF THIS NOTICE, OR THE APPLICATION WILL BE ACTED UPON BY THE BOARD'S PETROLEUM ENGINEER WITHOUT HEARING. A DEMAND MUST: (1) SET FORTH THE NAME, ADDRESS AND TELEPHONE NUMBER OF EACH INTERESTED PARTY, THEIR OWNERSHIP INTEREST IN THE LANDS SURROUNDING THE PROPOSED WELL, AND THE REASONS WHY A HEARING IS SOUGHT; (2) BE SERVED UPON THE APPLICANT BY COPY MAILED OR FAX TRANSMITTED TO THE ADDRESS SET FORTH ABOVE.

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

RECEIVED
MAR 26 2026
MONTANA BOARD OF OIL &
GAS CONSERVATION • BILLINGS
341-2026

Notice of Application

Published in Helena Independent Record on March 26, 2026

Location
Lewis and Clark County, Montana
Notice Text

NOTICE OF INTENTION TO APPLY FOR PERMIT TO DRILL OIL AND GAS WELL
BEFORE THE BOARD OF OIL AND GAS CONSERVATION OF THE STATE OF MONTANA
In the Matter of the application of
OUTLAW FED 23-26-35 4HF
by Phoenix Operating LLC
for a Permit to Drill an oil and gas well.

1. Name and address of Applicant:
Phoenix Operating LLC
4643 S Ulster, Ste 1510
Denver, CO 80237
2. Legal Description including County and Approximate Footages of Surface Location of Proposed Oil and Gas Well:
(and projected bottom-hole location, if a directional or horizontal well)
Surface Location at 846' FNL and 1828' FEL in NWNE,
Section 23, Township 26 North, Range 55 East, Richland County, Montana.
Bottom Hole Location at 240' FSL and 550' FEL in SESE,
Section 35, Township 26 North, Range 55 East, Richland County, Montana.
3. Total Depth Proposed to be Drilled:
25811' Measured Depth, 9934' Total Vertical Depth
Notice is hereby given that an application for permit to drill an oil and gas well at the surface location set forth above to the depth as stated will be filed with the Montana Board of Oil and Gas Conservation. Pursuant to Rules 36.22.601 and 36.22.604, Administrative Rules of Montana, an interested party may demand an opportunity to be heard by the Montana Board of Oil and Gas Conservation concerning the application. SUCH DEMAND FOR HEARING MUST BE RECEIVED BY THE MONTANA BOARD OF OIL AND GAS CONSERVATION AT THE ADDRESS SET FORTH BELOW NO LATER THAN TEN (10) DAYS AFTER THE DATE OF PUBLICATION OF THIS NOTICE, OR THE APPLICATION WILL BE ACTED UPON BY THE BOARD'S PETROLEUM ENGINEER WITHOUT HEARING. A DEMAND MUST: (1) SET FORTH THE NAME, ADDRESS AND TELEPHONE NUMBER OF EACH INTERESTED PARTY, THEIR OWNERSHIP INTEREST IN THE LANDS SURROUNDING THE PROPOSED WELL, AND THE REASONS WHY A HEARING IS SOUGHT; (2) BE SERVED UPON THE APPLICANT BY COPY MAILED OR FAX TRANSMITTED TO THE ADDRESS SET FORTH ABOVE.

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

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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. TO AMEND BOARD ORDER 163-2024 TO REMOVE EXPIRATION LANGUAGE AND ELIMINATE ANY REQUIREMENT THAT OPERATIONS BE COMMENCED BY A DATE CERTAIN FOR THE OVERLAPPING TEMPORARY SPACING UNIT COMPRISED OF ALL OF SECTIONS 13, 14, 23, 24, 25 AND 26, TOWNSHIP 26 NORTH, RANGE 53 EAST, RICHLAND COUNTY, MONTANA

MBOGC Docket No. 371-2026

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 Sections 13, 14, 23, 24, 25 and 26, Township 26 North, Range 53 East, Richland County, Montana, which tracts presently comprise an overlapping temporary spacing unit with respect to the Bakken/Three Forks formation established by Order No. 163-2024.

2. The configuration of the subject temporary spacing unit was specifically designed and approved to address unique section line considerations between 13, 14, 23, 24, 25 and 26, T26N, R53E. This unit is in a developed area and maintaining this spacing configuration is critical to ensuring orderly development of the reservoir, preventing waste and protecting correlative rights. The current expiration provision is not conducive to these objectives, as it introduces unnecessary uncertainty.

3. Applicant requests that Bord Order No. 163-2024 be amended to remove expiration language and eliminate any requirement that operations be commenced by a date certain, with all other provisions in Board Order No. 163-2024 remaining in full force and effect.

[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 amending Order No. 163-2024 to provide that operations for drilling a well in Sections 13, 14, 23, 24, 25 and 26, Township 26 North, Range 53 East, Richland County, Montana be amended to remove expiration language and eliminate any requirement that operations be commenced by a date certain, with all other provisions in Board Order No. 163-2024 remaining in full force and effect.

3. Any other relief deemed necessary and proper.

Dated May 6, 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 24 NORTH, RANGE 53 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 TWO YEARS 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.

APPLICANT FURTHER REQUESTS THAT BOARD ORDER 61-2006 PERTAINING TO SECTIONS 5 AND 8, T24N-R53E, BE AMENDED TO CLARIFY THAT THE PERMANENT SPACING UNIT IS LIMITED TO OIL AND GAS PRODUCED FROM THE BAKKEN/THREE FORKS FORMATION AND ASSOCIATED NATURAL GAS FROM THE JUNE 2-5H WELL AND THE JUNE 1-8H WELL

APPLICANT FURTHER REQUESTS THAT BOARD ORDER 354-2014 PERTAINING TO SECTIONS 4, 5, 8, AND 9, T24N-R53E BE AMENDED TO CLARIFY THAT THE PERMANENT SPACING UNIT IS LIMITED TO PRODUCTION FROM THE JUNE BR 1-5 HSL WELL.

APPLICANT FURTHER REQUESTS THAT BOARD ORDER 289-2007 PERTAINING TO SECTION 17, T24N-R53E BE AMENDED TO CLARIFY THAT SAID ORDER IS LIMITED TO OIL AND ASSOCIATED NATURAL GAS PRODUCED FROM THE BAKKEN/THREE FORKS FORMATION FROM THE BR 41-17H 43 WELL.

APPLICANT FURTHER REQUESTS THAT BOARD ORDER 353-2014 PERTAINING TO SECTIONS 17 AND 20, T24N, R53E BE AMENDED TO CLARIFY THAT SAID ORDER IS LIMITED TO OIL AND ASSOCIATED NATURAL GAS PRODUCED FROM THE BAKKEN/THREE FORKS FORMATION FROM THE CHERRY 2-17H WELL.

APPLICANT FURTHER REQUESTS THAT BOARD ORDER 128-2006 PERTAINING TO SECTION 20, T24N, R53E BE AMENDED TO CLARIFY THAT SAID ORDER IS LIMITED TO OIL AND ASSOCIATED NATURAL GAS PRODUCED FROM THE BAKKEN/THREE FORKS FORMATION FROM THE CHERRY 1-20H WELL.

MBOGC Docket No. 433 - 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 Sections 5, 8, 17 and 20, Township 24 North, Range 53 East Richland County, Montana, which tracts are presently spaced with respect to the Bakken/Three Forks Formation by Orders:

   - 61-2006 – creating a permanent spacing unit comprised of All of Sections 5 and 8, T24N, R53E.
   - 354-2014 – creating a permanent spacing unit comprised of All of Sections 4, 5, 8 and 9, T24N, R53E.
   - 280-2007 – creating a permanent spacing unit comprised of All of Section 17, T24N, R53E.
   - 352-2014 – creating a permanent spacing unit comprised of All of Sections 17 and 20, T24N, R53E.
   - 127-2006 – creating a permanent spacing unit comprised of All of Section 20, T24N, R53E.

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 comprised of All of Sections 5, 8, 17 and 20, Township 24 North, Range 53 East Richland County, Montana, subject to the conditions that applicant must commence said well within two years of the date of the order issued by the Board and that the temporary spacing unit be limited to production from the proposed horizontal well.

[B] **Requests:**

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

2. After hearing the matter, the Montana Board of Oil & Gas Conservation enter its order that an OTSU comprised of All of Sections 5, 8, 17 and 20, Township 24 North, Range 53 East Richland County, Montana be established, subject to the condition that applicant must commence said well within two years of the date of the order issued by the Board;

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

4. Amending Order 61-2006 to clarify that said order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the June 2-5H well and the June 1-8H well.

5. Amending Order 354-2014 to clarify that said order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the June BR 1-5HSL well.

6. Amending Order 289-2007 to clarify that said order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the BR 41-17H 43 well.

7. Amending Order 353-2004 to clarify that said order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the Cherry 2-17H well.

8. Amending Order 128-2006 to clarify that said order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the Cherry 1-20H well.

9. Any other relief deemed necessary and proper.

Dated July 6, 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

IN THE MATTER OF THE APPLICATION OF PHOENIX OPERATING LLC, FOR AN ORDER CREATING AN OVERLAPPING TEMPORARY SPACING UNIT ("OTSU") COMPRISED OF ALL OF SECTIONS 25, 26, AND 27, TOWNSHIP 23 NORTH, RANGE 59 EAST, 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 OTSU, VACATING MBOGC ORDER NO. 380-2011 INSOFAR AS APPLICABLE TO THE APPLICATION LANDS, VACATING MBOGC ORDER NO. 614-2012, AND AMENDING MBOGC ORDER NO. 612-2012 TO CLARIFY THAT SAID ORDER IS LIMITED TO THE BAKKEN/THREE FORKS FORMATION OIL AND ASSOCIATED NATURAL GAS FROM THE HANSON #44X-26B WELL, AND SUCH OTHER RELIEF AS THE BOARD MAY DEEM APPROPRIATE.	**MBOGC DOCKET NO.** 446-2026 **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 25, 26, and 27, Township 23 North, Range 59 East, Richland County, Montana (the "Application Lands").
2. The Bakken/Three Forks formation within a portion of the Application Lands is presently subject to Montana Board of Oil and Gas Conservation ("MBOGC" and the "Board") Order No. 380-2011, a statewide temporary spacing order for the Bakken/Three Forks pool.
3. Sections 26 and 27 of the Application Lands are subject to MBOGC Order Nos. 612-2012 and 614-2012. Order No. 612-2012 establishes a permanent spacing unit for production of the Bakken/Three Forks formation from the Hanson #44X-26B well. Order No. 614-2012 authorizes drilling of up to three additional wells within the permanent spacing unit.

4. The Hanson #44X-26B well is currently shut-in and operated by MorningStar Operating LLC in this permanent spacing unit.
5. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the Application 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 an OTSU comprised of all of Sections 25, 26, and 27, Township 23 North, Range 59 East, Richland County, Montana. To grant the requested relief, it will be necessary to (i) vacate MBOGC Order No. 380-2011 insofar as applicable to the Application Lands; (ii) vacate MBOGC Order No. 614-2012; and (iii) amend MBOGC Order No. 612-2012 to clarify that said order is limited to the Bakken/Three Forks formation oil and associated natural gas from the Hanson #44X-26B well.
6. Applicant believes this request prevents the waste of oil and gas, avoids the drilling of unnecessary wells, and protects the correlative rights of all interested parties.
7. Applicant will, within ninety (90) days of successful completion of the proposed horizontal operation, file an application for the Board's consideration of permanent spacing and other matters relating to production from said wells.

Applicant Requests:

1. This matter be set for hearing, with notice given as required by law;
8. After hearing the matter, the Board enter its order (i) creating an OTSU comprised of Sections 25, 26, and 27, Township 23 North, Range 59 East, Richland 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 within two (2) years from the date of such order; (ii) vacate MBOGC Order No. 380-2011 insofar as applicable to the Application Lands; (iii) vacate MBOGC Order No. 614-2012; (iv) amend MBOGC Order No. 612-2012 to clarify that said order is limited to the Bakken/Three Forks formation oil and associated natural gas from the Hanson #44X-26B well; and
2. For such other or additional relief as the Board may deem appropriate.

DATED this 9th day of July 2026.

PHOENIX OPERATING LLC

By Kelley Huemoeller Lewis

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

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

IN THE MATTER OF THE APPLICATION OF PHOENIX OPERATING 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 25, 26, AND 27, TOWNSHIP 23 NORTH, RANGE 59 EAST, RICHLAND COUNTY, MONTANA AT ANY LOCATIONS NOT CLOSER THAN 200' (HEEL/TOE SETBACK)/500' (LATERAL SETBACK) TO THE BOUNDARIES OF SAID OTSU, AND SUCH OTHER RELIEF AS THE BOARD MAY DEEM APPROPRIATE.	**MBOGC DOCKET NO.** 447-2026 **APPLICATION**

******

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 25, 26, and 27, Township 23 North, Range 59 East, Richland County, Montana (the "Application Lands"). It is anticipated that said Application Lands will comprise an OTSU for purposes of Bakken/Three Forks formation production pursuant to Montana Board of Oil and Gas Conservation ("MBOGC" and the "Board") Order No. _____ - 2026.
2. Applicant requests authorization from the Board to drill up to three (3) additional horizontal Bakken/Three Forks formation wells within said OTSU, at any location not closer than 200' (heel/toe setback)/500' (lateral setback) to the exterior boundaries of the OTSU, if in Applicant's judgment as operator of the OTSU, such action appears reasonable and prudent.

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 (3) additional horizontal Bakken/Three Forks formation wells within said OTSU, at any location but not closer than 200' (heel/toe setback)/ 500' (lateral setback) to the exterior boundaries of an OTSU comprised of all of Sections 25, 26, and 27, Township 23 North, Range 59 East, Richland County, Montana; and

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

DATED this 9th day of July 2026.

PHOENIX OPERATING LLC

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

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

IN THE MATTER OF THE APPLICATION OF PHOENIX OPERATING LLC, FOR AN ORDER CREATING A TEMPORARY SPACING UNIT ("TSU") COMPRISED OF ALL OF SECTIONS 34, 35, AND 36, TOWNSHIP 23 NORTH, RANGE 59 EAST, 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, VACATING MBOGC ORDER NO. 380-2011 INSOFAR AS APPLICABLE TO THE APPLICATION LANDS AND ANY OTHER RELIEF AS THE BOARD MAY DEEM APPROPRIATE.	**MBOGC DOCKET NO.** 449 - 2026 **APPLICATION**

******

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 34, 35, and 36, Township 23 North, Range 59 East, Richland County, Montana (the "Application Lands").
2. The Bakken/Three Forks formation within the Application Lands is presently subject to Montana Board of Oil and Gas Conservation ("MBOGC" and the "Board") Order No. 380-2011, a statewide temporary spacing order for the Bakken/Three Forks pool.
3. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the Application 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 all of Sections 34, 35, and 36, Township 23 North, Range 59 East, Richland County, Montana.
4. To grant the requested relief, it will be necessary to vacate MBOGC Order No. 380-2011 insofar as applicable to the Application Lands.
5. Applicant believes this 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 the Board's consideration of permanent spacing and other matters relating to production from said wells.

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 (i) creating a TSU comprised of Sections 34, 35, and 36, Township 23 North, Range 59 East, 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 (2) years from the date of such order; (ii) vacating MBOGC Order No. 380-2011 insofar as applicable to the Application Lands; and
3. For such other or additional relief as the Board may deem appropriate.

DATED this 9th day of July 2026.

PHOENIX OPERATING LLC

By Kelley Huemoeller Lewis

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

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

IN THE MATTER OF THE APPLICATION OF PHOENIX OPERATING 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 34, 35, AND 36, TOWNSHIP 23 NORTH, RANGE 59 EAST, RICHLAND COUNTY, MONTANA, AT ANY LOCATIONS NOT CLOSER THAN 200' (HEEL/TOE SETBACK)/500' (LATERAL SETBACK) TO THE BOUNDARIES OF SAID TSU, AND SUCH OTHER RELIEF AS THE BOARD MAY DEEM APPROPRIATE.	**MBOGC DOCKET NO.** 449-2026 **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 34, 35, and 36, Township 23 North, Range 59 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 ("MBOGC" and the "Board") Order No. _____ - 2026.
2. Applicant requests authorization from the Board to drill up to three (3) additional horizontal Bakken/Three Forks formation wells within said TSU, at any location 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.

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 (3) additional horizontal Bakken/Three Forks formation wells within said TSU, at any location but not closer than 200' (heel/toe setback)/ 500' (lateral setback) to the exterior boundaries of a TSU comprised of all of Sections 34, 35, and 36, Township 23 North, Range 59 East, Richland County, Montana; and
3. For such other or additional relief as the Board may deem appropriate.

DATED this 9th day of July 2026.

PHOENIX OPERATING LLC

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

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

IN THE MATTER OF THE APPLICATION OF WHITE ROCK OIL & GAS, LLC FOR AN ORDER CREATING AN OVERLAPPING TEMPORARY SPACING UNIT ("OTSU") COMPRISED OF ALL OF SECTIONS 16, 21, 28 AND 33, TOWNSHIP 24 NORTH, RANGE 53 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 THE OTSU, CLARIFYING BOARD ORDER NOS. 12-2006, 281-2007, 210-2006 & 284-2007, AND ANY OTHER RELIEF THAT THE BOARD MAY DEEM APPROPRIATE.	**MBOGC DOCKET NO.** 471-2026 **APPLICATION**

WHITE ROCK OIL & GAS, LLC, 5810 TENNYSON PKWY, SUITE 500, PLANO, TX 75024:

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

1. Applicant is an interest owner within all or portions of Sections 16, 21, 28 & 33, Township 24 North, Range 53 East, M.P.M., Richland County, Montana. Section 21 is subject to Board Order 281-2007, and White Rock Oil & Gas, LLC operates the BR 31-21H 43 well located in the PSU comprised of Section 21, Township 24 North, Range 53 East. Section 33 is subject to Board Order 284-2007, and White Rock Oil & Gas, LLC operates the BR 41-33H 43 well located in the PSU comprised of Section 33, Township 24 North, Range 53 East. Section 16 is presently subject to Board Order 12-2006, and Slawson Exploration Company, Inc. ("SECI") operates the Bearcat State 1-16H well located in the PSU. Section 28 is presently subject to Board Order 210-2006, and SECI operates the Stinger 1-28H well located in the PSU. Applicant has or will obtain SECI's consent to establish this OTSU.

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 Sections 16, 21, 28 & 33, Township 24 North, Range 53 East, M.P.M., Richland County, Montana.

To preserve correlative rights of all interest owners in Section 16, Board Order No. 12-2006 should be amended to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the Bearcat State 1-16H well. To preserve correlative rights of all interest owners in Section 21, Board Order No. 281-2007 should be amended to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the BR 31-21H 43 well. To preserve correlative rights of all interest owners in Section 28, Board Order No. 210-2006 should be amended to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the Stinger 1-28H well. To preserve correlative rights of all interest owners in Section 33, Board Order No. 284-2007 should be amended to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the BR 41-33H 43 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 relating to production from the well.

[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 16, 21, 28 & 33, Township 24 North, Range 53 East, M.P.M., Richland 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; **(ii)** amending Board Order 12-2006 to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the Bearcat State 1-16H well; **(iii)** amending Board Order 281-2007 to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the BR 31-21H 43 well; **(iv)** amending Board Order 210-2006 to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the Stinger 1-28H well; **(v)** amending Board Order 284-2007 to clarify that the order is limited to oil and associated natural gas produced from the Bakken/Three Forks formation from the BR 41-33H 43 well; and **(vi)** any other relief as the Board may deem appropriate.

Dated this 9th day of July, 2026.

WHITE ROCK OIL & GAS, LLC

By _____

Uriah J. Price, Its Attorney
Crowley Fleck, PLLP
P. O. Box 10969
Bozeman, MT 59719
uprice@crowleyfleck.com

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

IN THE MATTER OF THE APPLICATION OF WHITE ROCK OIL & GAS, LLC FOR AN ORDER AUTHORIZING THE DRILLING OF ONE (1) ADDITIONAL HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL IN AN OVERLAPPING TEMPORARY SPACING UNIT ("OTSU") COMPRISED OF ALL OF SECTIONS 16, 21, 28 AND 33, TOWNSHIP 24 NORTH, RANGE 53 EAST, M.P.M., RICHLAND COUNTY, MONTANA, AT ANY LOCATION NOT CLOSER THAN 200' (HEEL TOE SETBACK) / 500' (LATERAL SETBACK) TO THE BOUNDARIES OF THE OTSU, AND SUCH OTHER AND FURTHER RELIEF AS THE BOARD MAY DEEM APPROPRIATE.	**MBOGC DOCKET NO.** 472-2026 **APPLICATION**

WHITE ROCK OIL & GAS, LLC, 5810 TENNYSON PKWY, SUITE 500, PLANO, TX 75024:

[A] Presents the following application:

1. Applicant is an interest owner within all or portions of Sections 16, 21, 28 & 33, Township 24 North, Range 53 East, M.P.M., Richland County, Montana. It is anticipated that Sections 16, 21, 28 & 33, Township 24 North, Range 53 East, will comprise an OTSU for purposes of Bakken/Three Forks formation production per Board Order ____-2026.

2. To recover additional Bakken/Three Forks formation reserves underlying the captioned lands, Applicant requests authority to drill one (1) additional horizontal Bakken/Three Forks formation well within the OTSU, at any location not closer than 200' (heel toe setback) / 500' (lateral setback) to the exterior boundaries thereof.

[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)** authorizing the Applicant to drill one (1) additional horizontal Bakken/Three Forks formation well at any location within, but not closer than 200' (heel toe setback) / 500' (lateral setback) to the exterior boundaries of the OTSU comprised of Sections 16, 21, 28 & 33, Township 24 North, Range 53 East, M.P.M., Richland County, Montana; and **(ii)** such other and further relief as the Board may deem appropriate.

Dated this 9th day of July, 2026.

WHITE ROCK OIL & GAS, LLC

By _____

Uriah J. Price, Its Attorney
Crowley Fleck, PLLP
P. O. Box 10969
Bozeman, MT 59719
uprice@crowleyfleck.com

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

IN THE MATTER OF THE APPLICATION OF MORNINGSTAR OPERATING LLC FOR AN ORDER CREATING AN OVERLAPPING TEMPORARY SPACING UNIT ("OTSU") COMPRISED OF ALL OF SECTIONS 14, 15, 22, 23, 26 & 27, TOWNSHIP 24 NORTH, RANGE 54 EAST, M.P.M., RICHLAND COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT A LOCATION PROXIMATE TO THE COMMON BOUNDARY BETWEEN SECTIONS 14, 23 & 26, TOWNSHIP 24 NORTH, RANGE 54 EAST, AND SECTIONS 15, 22 & 27, TOWNSHIP 24 NORTH, RANGE 54 EAST, VACATING BOARD ORDER NOS. 15-2009 & 269-2014, AND ANY OTHER RELIEF THAT THE BOARD MAY DEEM APPROPRIATE.	**MBOGC DOCKET NO.** 535-2026 **APPLICATION**

MORNINGSTAR OPERATING LLC, 400 W 7TH ST., FORT WORTH, TX 76102:

[A] Presents the following application:

1. Applicant is an interest owner within all or portions of Sections 14, 15, 22, 23, 26 & 27, Township 24 North, Range 54 East, M.P.M., Richland County, Montana. Sections 14 & 23, Township 24 North, Range 54 East, comprise a permanent spacing unit for purposes of Bakken formation production pursuant to Board Order 51-2004. Sections 15 & 22, Township 24 North, Range 54 East, comprise a permanent spacing unit for purposes of Bakken formation production pursuant to Board Order 77-2004. Section 27, Township 24 North, Range 54 East, comprise a permanent spacing unit for purposes of Bakken formation production pursuant to Board Order 318-2003. Section 26 (along with Section 35), Township 24 North, Range 54 East, comprise a permanent spacing unit for purposes of Bakken formation production pursuant to Board Order 75-2004. Sections 14, 15, 22 & 23, Township 24 North, Range 54 East, comprise an undeveloped overlapping temporary spacing unit for purposes of Bakken formation production pursuant to Board Order Nos. 15-2009 & 269-2014.

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 in an OTSU comprised of all of Sections 14, 15, 22, 23, 26 & 27, Township 24 North, Range 54 East, M.P.M., Richland County, Montana. The well will be drilled at a location proximate to the common boundary between all of Sections 14, 23 & 26, Township 24 North, Range 54 East, and all of Sections 15, 22 & 27, Township 24 North, Range 54 East, with a heel/toe setback of 200'. It will also be necessary to vacate Board Order Nos. 15-2009 & 269-2014.

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 relating to production from the well.

[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 14, 15, 22, 23, 26 & 27, Township 24 North, Range 54 East, M.P.M., Richland County, Montana, for purposes of drilling a horizontal Bakken/Three Forks formation well at a location proximate to the common boundary between

all of Sections 14, 23 & 26, Township 24 North, Range 54 East, and all of Sections 15, 22 & 27, Township 24 North, Range 54 East, with a heel/toe setback of 200', and providing that the OTSU shall be limited to production from the proposed horizontal well with no allocation to portions of any existing spacing unit located outside of the OTSU boundaries; **(ii)** vacating Board Order Nos. 15-2009 & 269-2014; and **(iii)** any other relief that the Board deems appropriate.

Dated this 1st day of September, 2026.

MORNINGSTAR OPERATING LLC

By _____

Uriah J. Price, Its Attorney
Crowley Fleck, PLLP
P. O. Box 10969
Bozeman, MT 59719
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BEFORE THE BOARD OF OIL AND GAS CONSERVATION OF THE STATE OF MONTANA

IN THE MATTER OF THE APPLICATION OF MORNINGSTAR OPERATING LLC FOR AN ORDER CREATING AN OVERLAPPING TEMPORARY SPACING UNIT ("OTSU") COMPRISED OF ALL OF SECTIONS 13, 14, 23, 24, 25 & 26, TOWNSHIP 24 NORTH, RANGE 54 EAST, M.P.M., RICHLAND COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT A LOCATION PROXIMATE TO THE COMMON BOUNDARY BETWEEN SECTIONS 14, 23 & 26, TOWNSHIP 24 NORTH, RANGE 54 EAST, AND SECTIONS 13, 24 & 25, TOWNSHIP 24 NORTH, RANGE 54 EAST, VACATING BOARD ORDER NOS. 15-2009 & 269-2014, AND ANY OTHER RELIEF THAT THE BOARD MAY DEEM APPROPRIATE.	**MBOGC DOCKET NO.** 536-2026 **APPLICATION**

MORNINGSTAR OPERATING LLC, 400 W 7TH ST., FORT WORTH, TX 76102:

[A] Presents the following application:

1. Applicant is an interest owner within all or portions of Sections 13, 14, 23, 24, 25 & 26, Township 24 North, Range 54 East, M.P.M., Richland County, Montana. Sections 14 & 23, Township 24 North, Range 54 East, comprise a permanent spacing unit for purposes of Bakken formation production pursuant to Board Order 51-2004. Section 26 (along with Section 35), Township 24 North, Range 54 East, comprise a permanent spacing unit for purposes of Bakken formation production pursuant to Board Order 75-2004. Section 13 (along with Section 12), Township 24 North, Range 54 East, comprise a permanent spacing unit for purposes of Bakken formation production pursuant to Board Order 149-2004. Sections 24 & 25, Township 24 North, Range 54 East, comprise a permanent spacing unit for purposes of Bakken formation production pursuant to Board Order 161-2010. Sections 14, 15, 22 & 23, Township 24 North, Range 54 East, comprise an undeveloped overlapping temporary spacing unit for purposes of Bakken formation production pursuant to Board Order Nos. 15-2009 & 269-2014.

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 in an OTSU comprised of all of Sections 13, 14, 23, 24, 25 & 26, Township 24 North, Range 54 East, M.P.M., Richland County, Montana. The well will be drilled at a location proximate to the common boundary between all of Sections 14, 23 & 26, Township 24 North, Range 54 East, and all of Sections 13, 24 & 25, Township 24 North, Range 54 East, with a heel/toe setback of 200'. It will also be necessary to vacate Board Order Nos. 15-2009 & 269-2014.

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 relating to production from the well.

[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 13, 14, 23, 24, 25 & 26, Township 24 North, Range 54 East, M.P.M., Richland County, Montana, for purposes of drilling a horizontal Bakken/Three Forks formation well at a location proximate to the common boundary between

all of Sections 14, 23 & 26, Township 24 North, Range 54 East, and all of Sections 13, 24 & 25, Township 24 North, Range 54 East, with a heel/toe setback of 200', and providing that the OTSU shall be limited to production from the proposed horizontal well with no allocation to portions of any existing spacing unit located outside of the OTSU boundaries; **(ii)** vacating Board Order Nos. 15-2009 & 269-2014; and **(iii)** any other relief that the Board deems appropriate.

Dated this 1st day of September, 2026.

MORNINGSTAR OPERATING LLC

By _____

Uriah J. Price, Its Attorney
Crowley Fleck, PLLP
P. O. Box 10969
Bozeman, MT 59719
uprice@crowleyfleck.com

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 PERMANENT SPACING UNIT COMPRISED OF ALL OF SECTIONS 6, 7, 18 AND 19 TOWNSHIP 25 NORTH, RANGE 57 EAST, M.P.M., RICHLAND COUNTY, MONTANA

MBOGC Docket No.

APPLICATION 539-2026

CONTINENTAL RESOURCES, INC., 20 N. BROADWAY, OKLAHOMA CITY, OK 73102:

[A] Presents the following application:

1. Applicant is an interest owner and operator within Sections 6, 7, 18 and 19, Township 25 North, Range 57 East, M.P.M., Richland County, Montana, which tract is presently subject to a temporary spacing unit comprised of those same lands.

2. Applicant has drilled the Conaway 2-19H Well to recover Bakken/Three Forks Formation reserves underlying Sections 6, 7, 18 and 19, Township 25 North, Range 57 East, M.P.M., Richland County, Montana.

3. Applicant will show that the requested permanent spacing unit is appropriate for the efficient and economic recovery of the mineral resources underlying the captioned lands.

[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 designating a permanent spacing unit comprised of Sections 6, 7, 18 and 19, Township 25 North, Range 57 East, M.P.M., Richland County, Montana, for production of oil and associated natural gas from the Conaway 2-19H Well.

3. For such other relief as may be deemed necessary and proper.

Dated September 3, 2026.

CONTINENTAL RESOURCES INC.

By Scotti Gray
Scotti Gray
Attorney for Applicant

DBOARD OF OIL AND GAS CONSERVATION
OF THE STATE OF MONTANA

IN THE MATTER OF THE APPLICATION OF CONTINENTAL RESOURCES INC. FOR AN ORDER POOLING ALL INTERESTS IN ALL OF SECTIONS 6, 7, 18 AND 19 TOWNSHIP 25 NORTH, RANGE 57 EAST, M.P.M., RICHLAND COUNTY, MONTANA, ON THE BASIS OF SURFACE ACRES FOR PRODUCTION OF OIL AND ASSOCIATED NATURAL GAS FROM THE BAKKEN/THREE FORKS FORMATION FROM THE CONAWAY 2-19H WELL AND AUTHORIZING NON-JOINDER PENALTIES IN ACCORDANCE WITH SECTION 82-11-202(2), M.C.A.

MBOGC Docket No. 540-2026

APPLICATION

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

[A] Presents the following application:

1. Applicant has requested that the Board delineate Sections 6, 7, 18 and 19, Township 25 North, Range 57 East, M.P.M., Richland County, Montana, as a permanent spacing unit for the Conaway 2-19H Well for production of oil and associated natural gas produced from the Bakken/Three Forks Formation.

2. Applicant has attempted to voluntarily pool all interests in the permanent spacing unit for production from the Conaway 2-19H Well but has been unable to do so.

3. Owner(s) in the permanent spacing unit for the drilling of the Conaway 2-19H Well did not pay or agree in writing to pay their share of the costs associated with said well prior to the spudding thereof.

[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 as follows:

(a) Pooling all interests in Sections 6, 7, 18 and 19, Township 25 North, Range 57 East, M.P.M., Richland County, Montana, on the basis of surface acres for production of oil and associated natural gas from the Bakken/Three Forks Formation from the Conaway 2-19H Well;

(b) Authorizing the recovery of non-joinder penalties from the refusing owners in accordance with Section 82-11-202(2), M.C.A.; and

(c) For such other relief as may be deemed necessary and proper.

Dated September 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 AMENDING BOARD ORDER 222-2025 TO PROVIDE THAT OPERATIONS FOR THE DRILLING OF A WELL IN THE TEMPORARY SPACING UNIT COMPRISED OF ALL OF SECTIONS 16, 21, 28 AND 33, TOWNSHIP 26 NORTH, RANGE 56 EAST, RICHLAND COUNTY, MONTANA, MUST BE COMMENCED BY OCTOBER 15, 2028

MBOGC Docket No. 541-2026

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 Sections 16, 21, 28 and 33, Township 26 North, Range 56 East, Richland County, Montana which tracts are presently spaced with respect to the Bakken/Three Forks formation by Order:

    - 222-2025 – creating a temporary spacing unit comprised of All of Sections 16, 21, 28 and 33, T26N, R56E.

2. Applicant requests that Board Order 222-2025 be amended to provide that operations for drilling a well in the above-described spacing unit must be commenced prior to October 15, 2028 with all other provisions of Board Order 222-2025 remaining in full force and effect.

3. Applicant notes that federal minerals are located within certain tracts affected by this application, namely the SWNE, SENW, NESW, and NWSE of Section 21, and the W2SW and SESW of Section 28, Township 26 North, Range 56 East.

[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 its order

    (i) amending Board Order 222-2025 to provide that operations of the drilling of the well in the TSU comprised of All of Sections 16, 21, 28 and 33, Township 26 North, Range 56 East, Richland County, Montana be commenced not later than October 15, 2028 with all other provisions of Board Order 232-2025 remaining in full force and effect; and

    (ii) such other relief as the Board may deem appropriate.

Dated September 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

IN THE MATTER OF THE APPLICATION OF WHITE ROCK OIL & GAS, LLC FOR AN ORDER CREATING AN OVERLAPPING TEMPORARY SPACING UNIT ("OTSU") COMPRISED OF THE S½ OF SECTION 15 & ALL OF SECTIONS 22, 27 AND 34, TOWNSHIP 23 NORTH, RANGE 58 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 THE OTSU, CLARIFYING BOARD ORDER NOS. 136-2005, 155-2005, 214-2006 & 385-2005, VACATING BOARD ORDER NO. 46-2006 IF THE BOARD DEEMS IT NECESSARY, AND ANY OTHER RELIEF THAT THE BOARD MAY DEEM APPROPRIATE.	**MBOGC DOCKET NO.** 561-2026 **APPLICATION**

WHITE ROCK OIL & GAS, LLC, 5810 TENNYSON PKWY, SUITE 500, PLANO, TX 75024:

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

1. Applicant is an interest owner within all or portions of the S½ of Section 15 and Sections 22, 27 & 34, Township 23 North, Range 58 East, M.P.M., Richland County, Montana. The SW¼ of Section 15 and the W½ & SE¼ of Section 22, Township 23 North, Range 58 East, are subject to Board Order No. 136-2005 (PSU), and White Rock Oil & Gas, LLC operates the Lowell Larson 12-22H well located in the PSU. The SE¼ of Section 15 (along with the S½ of Section 14), Township 23 North, Range 58 East, are subject to Board Order 155-2005, which created a PSU for Bakken formation production from White Rock Oil & Gas, LLC's Sunwall 9-14H well. This well is currently producing from the Mission Canyon formation and has not produced from the Bakken formation since 2006. The NE¼ of Section 22, Township 23 North, Range 58 East, is subject to statewide spacing and includes White Rock Oil and Gas, LLC's vertical W.R. Cundiff 8-22R well, which is currently shut in. All of Section 27, Township 23 North, Range 58 East, is subject to Board Orders 214-2006 (PSU), 46-2006 (inc. density), 215-2006 (2nd inc. density) and 360-2006 (amending setbacks of order 215-2006 to allow for sidetrack), and MorningStar Operating LLC operates the Hedegaard 1-27H & Hedegaard 2-27H wells located in the PSU. It is unclear whether the Board applied Order 42-2006 to the western lateral of the Hedegaard 2-27H well, or if it can be vacated. Applicant has or will obtain MorningStar's consent to form the OTSU. All of Section 34, Township 23 North, Range 58 East, is subject to Board Order 385-2005 (PSU), and White Rock Oil & Gas, LLC operates the Lone Tree 1-34H well located in 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 at a location within, but not closer than 200' (heel toe setback) / 500' (lateral setback) to the exterior boundaries of, an OTSU comprised of the S½ of Section 15 and all of Sections 22, 27 & 34, Township 23 North, Range 58 East, M.P.M., Richland County, Montana. To preserve correlative rights of all interest owners in the SW¼ of Section 15 and the W½, SE¼ of Section 22, Township 23 North, Range 58 East, Board Order No. 136-2005 should be amended to clarify that the order is limited to oil and associated natural gas produced from the Bakken formation from the Lowell Larson 12-22H well. To preserve correlative rights of all interest owners in the SE¼ of Section 15 (along with the S½ of Section 14), Township 23 North, Range 58 East, Board Order No. 155-2005 should be amended to clarify that the order is limited to any future oil and associated natural gas produced from the Bakken formation from the Sunwall 9-14H well. To preserve correlative rights of all interest owners in Section 27, Township 23 North, Range 58 East,

Board Order No. 214-2006 should be amended to clarify that the order is limited to oil and associated natural gas produced from the Bakken formation from the Hedegaard 1-27H & Hedegaard 2-27H wells. Further, as discussed in paragraph 1 above, and only if the Board deems it necessary, Board Order No. 46-2006 can be vacated. To preserve correlative rights of all interest owners in Section 34, Township 23 North, Range 58 East, Board Order No. 385-2005 should be amended to clarify that the order is limited to oil and associated natural gas produced from the Bakken formation from the Lone Tree 1-34H 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 relating to production from the well.

[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 the S½ of Section 15 and all of Sections 22, 27 & 34, Township 23 North, Range 58 East, M.P.M., Richland 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; **(ii)** amending Board Order 136-2005 to clarify that the order is limited to oil and associated natural gas produced from the Bakken formation from the Lowell Larson 12-22H well; **(iii)** amending Board Order 155-2005 to clarify that the order is limited to any future oil and associated natural gas produced from the Bakken formation from the Sunwall 9-14H well; **(iv)** amending Board Order 214-2006 to clarify that the order is limited to oil and associated natural gas produced from the Bakken formation from the Hedegaard 1-27H & Hedegaard 2-27H wells; **(v)** amending Board Order 385-2005 to clarify that the order is limited to oil and associated natural gas produced from the Bakken formation from the Lone Tree 1-34H well; **(vi)** only to the extent the Board deems necessary, vacating Board Order 46-2006; and **(vii)** any other relief as the Board may deem appropriate.

Dated this 4th day of September, 2026.

WHITE ROCK OIL & GAS, LLC

By _____

Uriah D. Price, Its Attorney
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uprice@crowleyfleck.com

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

IN THE MATTER OF THE APPLICATION OF WHITE ROCK OIL & GAS, LLC FOR AN ORDER AUTHORIZING THE DRILLING OF ONE (1) ADDITIONAL HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL IN AN OVERLAPPING TEMPORARY SPACING UNIT ("OTSU") COMPRISED OF THE S½ OF SECTION 15 & ALL OF SECTIONS 22, 27 AND 34, TOWNSHIP 23 NORTH, RANGE 58 EAST M.P.M., RICHLAND COUNTY, MONTANA, AT ANY LOCATION NOT CLOSER THAN 200' (HEEL TOE SETBACK) / 500' (LATERAL SETBACK) TO THE BOUNDARIES OF THE OTSU, AND SUCH OTHER AND FURTHER RELIEF AS THE BOARD MAY DEEM APPROPRIATE.	**MBOGC DOCKET NO. 562-2026** **APPLICATION**

WHITE ROCK OIL & GAS, LLC, 5810 TENNYSON PKWY, SUITE 500, PLANO, TX 75024:

[A] Presents the following application:

1. Applicant is an interest owner within all or portions of the S½ of Section 15 and Sections 22, 27 & 34, Township 23 North, Range 58 East, M.P.M., Richland County, Montana. It is anticipated that the S½ of Section 15 and all of Sections 22, 27 & 34, Township 23 North, Range 58 East, will comprise an OTSU for purposes of Bakken/Three Forks formation production per Board Order ____-2026.

2. To recover additional Bakken/Three Forks formation reserves underlying the captioned lands, Applicant requests authority to drill one (1) additional horizontal Bakken/Three Forks formation well within the OTSU, at any location not closer than 200' (heel toe setback) / 500' (lateral setback) to the exterior boundaries thereof.

[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)** authorizing the Applicant to drill one (1) additional horizontal Bakken/Three Forks formation well at any location within, but not closer than 200' (heel toe setback) / 500' (lateral setback) to the exterior boundaries of the OTSU comprised of the S½ of Section 15 and all of Sections 22, 27 & 34, Township 23 North, Range 58 East, M.P.M., Richland County, Montana; and **(ii)** such other and further relief as the Board may deem appropriate.

Dated this 4th day of September, 2026.

WHITE ROCK OIL & GAS, LLC

By _____

Uriah J. Price, Its Attorney
Crowley Fleck, PLLP
P. O. Box 10969
Bozeman, MT 59719
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BEFORE THE BOARD OF OIL AND GAS CONSERVATION OF THE STATE OF MONTANA

IN THE MATTER OF THE APPLICATION OF WHITE ROCK OIL & GAS, LLC FOR AN ORDER CREATING AN OVERLAPPING TEMPORARY SPACING UNIT ("OTSU") COMPRISED OF THE S½ OF SECTION 15, THE S½ OF SECTION 16 & ALL OF SECTIONS 21, 22, 27, 28, 33 AND 34, TOWNSHIP 23 NORTH, RANGE 58 EAST M.P.M., RICHLAND COUNTY, MONTANA, AND AUTHORIZING THE DRILLING OF A HORIZONTAL BAKKEN/THREE FORKS FORMATION WELL THEREON AT A LOCATION PROXIMATE TO THE COMMON BOUNDARY BETWEEN THE SOUTH HALF OF SECTION 15 AND SECTIONS 22, 27 & 34, TOWNSHIP 23 NORTH, RANGE 58 EAST, AND THE SOUTH HALF OF SECTION 16 AND SECTIONS 21, 28 & 33, TOWNSHIP 23 NORTH, RANGE 58 EAST, RICHLAND COUNTY, MONTANA, AND ANY OTHER RELIEF THAT THE BOARD MAY DEEM APPROPRIATE.	**MBOGC DOCKET NO.** 563-2026 **APPLICATION**

WHITE ROCK OIL & GAS, LLC, 5810 TENNYSON PKWY, SUITE 500, PLANO, TX 75024:

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

1. Applicant is an interest owner within all or portions of the S½ of Section 15, the S½ of Section 16, and Sections 21, 22, 27, 28, 33 & 34, Township 23 North, Range 58 East, M.P.M., Richland County, Montana. It is anticipated that the S½ of Section 15 and Sections 22, 27 & 34, Township 23 North, Range 58 East, will comprise an OTSU for purposes of Bakken/Three Forks formation production per Board Order ____-2026. The N½ and SE¼ of Section 16, Township 23 North, Range 58 East, comprise a PSU for purposes of Bakken formation production per Board Order 122-2004. The SW¼ of Section 16, Township 23 North, Range 58 East, is subject to statewide spacing. All of Section 21, Township 23 North, Range 58 East, comprise a PSU for purposes of Bakken formation production per Board Order 518-2005. All of Section 28, Township 23 North, Range 58 East, comprise a PSU for purposes of Bakken formation production per Board Order 288-2005. All of Section 33, Township 23 North, Range 58 East, comprise a PSU for purposes of Bakken formation production per Board Order 109-2005.

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 in an OTSU comprised of the S½ of Section 15, the S½ of Section 16, and all of Sections 21, 22, 27, 28, 33 & 34, Township 23 North, Range 58 East, M.P.M., Richland County, Montana. The well will be drilled at a location proximate to the common boundary between the S½ of Section 15 & all of Sections 22, 27 & 34, Township 23 North, Range 58 East, and the S½ of Section 16 & all of Sections 21, 28 & 33, Township 23 North, Range 58 East, M.P.M., Richland County, Montana, with a heel/toe setback of 200'.

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 relating to production from the well.

[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 the S½ of Section 15, the S½ of Section 16, and all of Sections 21, 22, 27, 28, 33 & 34, Township 23 North, Range 58 East, M.P.M., Richland County, Montana, for purposes of drilling a horizontal Bakken/Three Forks formation well at a location proximate to the common boundary between the S½ of Section 15 & all of Sections 22, 27 & 34, Township 23 North, Range 58 East, and the S½ of Section 16 & all of Sections 21, 28 & 33, Township 23 North, Range 58 East, M.P.M., Richland County, Montana, with a heel/toe setback of 200', and providing that the OTSU shall be limited to production from the proposed horizontal well with no allocation to portions of any existing spacing unit located outside of the OTSU boundaries; and **(ii)** any other relief that the Board deems appropriate.

Dated this 4th day of September, 2026.

WHITE ROCK OIL & GAS, LLC

By _____

Uriah J. Price, Its Attorney
Crowley Fleck, PLLP
P. O. Box 10969
Bozeman, MT 59719
uprice@crowleyfleck.com

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

IN THE MATTER OF THE APPLICATION OF PHOENIX OPERATING LLC, FOR AN ORDER CREATING A TEMPORARY SPACING UNIT ("TSU") COMPRISED OF ALL OF SECTIONS 1, 12, AND 13, TOWNSHIP 32 NORTH, RANGE 58 EAST, 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 NO. 380-2011 INSOFAR AS APPLICABLE TO THE APPLICATION LANDS, AND SUCH OTHER RELIEF AS THE BOARD MAY DEEM APPROPRIATE.	**MBOGC DOCKET NO.** 574-2026 **APPLICATION**

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PHOENIX OPERATING LLC (the "Applicant"), 4643 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 1, 12, and 13, Township 32 North, Range 58 East, Sheridan County, Montana (the "Application Lands").
2. The Bakken/Three Forks formation within the Application Lands is presently subject to Montana Board of Oil and Gas Conservation ("MBOGC" and the "Board") Order No. 380-2011, a statewide temporary spacing order for the Bakken/Three Forks pool.
3. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the Application 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 all of Sections 1, 12, and 13, Township 32 North, Range 58 East, Sheridan County, Montana.
4. To grant the requested relief, it will be necessary to vacate MBOGC Order No. 380-2011 insofar as applicable to the Application Lands.
5. Applicant believes this request prevents waste of oil and gas, avoids drilling 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 well, file an application for the Board's consideration of permanent spacing and other matters relating to production from said well.

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 (i) creating a TSU comprised of Sections 1, 12, and 13, Township 32 North, Range 58 East, 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 within two (2) years from the date of such order; and (ii) vacating MBOGC Order No. 380-2011 insofar as applicable to the Application Lands; and
3. For such other or additional relief as the Board may deem appropriate.

DATED this 10th day of September 2026.

PHOENIX OPERATING LLC

By Kelley Huemoellar Lewis
Kelley Lewis, Attorney for Applicant
KLH Advisors PLLC
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Email: klh@klhadvisors.com

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

IN THE MATTER OF THE APPLICATION OF PHOENIX OPERATING 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 1, 12, AND 13, TOWNSHIP 32 NORTH, RANGE 58 EAST, SHERIDAN COUNTY, MONTANA, AT ANY LOCATIONS NOT CLOSER THAN 200' (HEEL/TOE SETBACK)/500' (LATERAL SETBACK) TO THE BOUNDARIES OF SAID TSU, AND SUCH OTHER RELIEF AS THE BOARD MAY DEEM APPROPRIATE.	**MBOGC DOCKET NO.** 575-2026 **APPLICATION**

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PHOENIX OPERATING LLC (the "Applicant"), 4643 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 1, 12, and 13, Township 32 North, Range 58 East, Sheridan County, Montana (the "Application Lands").
2. 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 ("MBOGC" and the "Board") Order No. _____ - 2026.
3. Applicant requests authorization from the Board to drill up to three (3) additional horizontal Bakken/Three Forks formation wells within said TSU, at any location 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.

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 (3) additional horizontal Bakken/Three Forks formation wells within the TSU comprising all of Sections 1, 12, and 13, Township 32 North, Range 58 East, Sheridan County, Montana, at any location but not closer than 200' (heel/toe setback)/ 500' (lateral setback) to the exterior boundaries of said TSU; and
3. For such other or additional relief as the Board may deem appropriate.

DATED this 10th day of September 2026.

PHOENIX OPERATING LLC

By Kelley Huemoeller Lewis
Kelley Lewis, Attorney for Applicant
KLH Advisors PLLC
1940 West Dickerson Street, Suite 206
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Email: klh@klhadvisors.com

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

IN THE MATTER OF THE APPLICATION OF PHOENIX OPERATING LLC, FOR AN ORDER CREATING A TEMPORARY SPACING UNIT ("TSU") COMPRISED OF ALL OF SECTIONS 2, 11, AND 14, TOWNSHIP 32 NORTH, RANGE 58 EAST, 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 NO. 380-2011 INSOFAR AS APPLICABLE TO THE APPLICATION LANDS, AND SUCH OTHER RELIEF AS THE BOARD MAY DEEM APPROPRIATE.	**MBOGC DOCKET NO.** 576-2026 **APPLICATION**

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PHOENIX OPERATING LLC (the "Applicant"), 4643 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 2, 11, and 14, Township 32 North, Range 58 East, Sheridan County, Montana (the "Application Lands").
2. The Bakken/Three Forks formation within the Application Lands is presently subject to Montana Board of Oil and Gas Conservation ("MBOGC" and the "Board") Order No. 380-2011, a statewide temporary spacing order for the Bakken/Three Forks pool.
3. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the Application 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 the TSU comprised of all of Sections 2, 11, and 14, Township 32 North, Range 58 East, Sheridan County, Montana.
4. To grant the requested relief, it will be necessary to vacate MBOGC Order No. 380-2011 insofar as applicable to the Application Lands.
5. Applicant believes this request prevents waste of oil and gas, avoids drilling 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 well, file an application for the Board's consideration of permanent spacing and other matters relating to production from said well.

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 (i) creating a TSU comprised of Sections 2, 11, and 14, Township 32 North, Range 58 East, 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 within two (2) years from the date of such order; (ii) vacating MBOGC Order No. 380-2011 insofar as applicable to the Application Lands; and
3. For such other or additional relief as the Board may deem appropriate.

DATED this 10th day of September 2026.

PHOENIX OPERATING LLC

By Kelley Huemoeller Lewis
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BEFORE THE BOARD OF OIL AND GAS CONSERVATION OF THE STATE OF MONTANA

IN THE MATTER OF THE APPLICATION OF PHOENIX OPERATING 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 2, 11, AND 14, TOWNSHIP 32 NORTH, RANGE 58 EAST, SHERIDAN COUNTY, MONTANA, AT ANY LOCATIONS NOT CLOSER THAN 200' (HEEL/TOE SETBACK)/500' (LATERAL SETBACK) TO THE BOUNDARIES OF SAID TSU, AND SUCH OTHER RELIEF AS THE BOARD MAY DEEM APPROPRIATE.	**MBOGC DOCKET NO.** 577-2026 **APPLICATION**

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PHOENIX OPERATING LLC (the "Applicant"), 4643 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 2, 11 and 14, Township 32 North, Range 58 East, Sheridan County, Montana (the "Application Lands").
2. 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 ("MBOGC" and the "Board") Order No. _____ - 2026.
3. Applicant requests authorization from the Board to drill up to three (3) additional horizontal Bakken/Three Forks formation wells within said TSU, at any location 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.

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 (3) additional horizontal Bakken/Three Forks formation wells within the TSU comprising all of Sections 2, 11, and 14, Township 32 North, Range 58 East, Sheridan County, Montana, at any location but not closer than 200' (heel/toe setback)/ 500' (lateral setback) to the exterior boundaries of said TSU; and
3. For such other or additional relief as the Board may deem appropriate.

DATED this 10th day of September 2026.

PHOENIX OPERATING LLC

By Kelley Huemoeller Lewis
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BEFORE THE BOARD OF OIL AND GAS CONSERVATION OF THE STATE OF MONTANA

IN THE MATTER OF THE APPLICATION OF PHOENIX OPERATING LLC, FOR AN ORDER CREATING A TEMPORARY SPACING UNIT ("TSU") COMPRISED OF ALL OF SECTIONS 4, 9, AND 16, TOWNSHIP 32 NORTH, RANGE 59 EAST, 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 NO. 380-2011 INSOFAR AS APPLICABLE TO THE APPLICATION LANDS, AND SUCH FURTHER RELIEF AS THE BOARD MAY DEEM APPROPRIATE.	**MBOGC DOCKET NO.** 579 - 2026 **FED. DOCKET NO.** 2 - 2027 **APPLICATION**

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PHOENIX OPERATING LLC (the "Applicant"), 4643 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 4, 9, and 16, Township 32 North, Range 59 East, Sheridan County, Montana (the "Application Lands").
2. The Bakken/Three Forks formation underlying the Application Lands is presently subject to Montana Board of Oil and Gas Conservation ("MBOGC" and the "Board") Order No. 380-2011, a statewide temporary spacing order for the Bakken/Three Forks pool.
3. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the Application 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 all of Sections 4, 9, and 16, Township 32 North, Range 59 East, Sheridan County, Montana.
4. To grant the requested relief, it will be necessary to vacate MBOGC Order No. 380-2011 insofar as applicable to the Application Lands.
5. Applicant believes this request prevents waste of oil and gas, avoids drilling 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 well, file an application for the Board's consideration of permanent spacing and other matters relating to production from said well.
7. The TSU contains the following Tribal minerals: Section 4, Township 32 North, Range 59 East, Lots 5, 6, E2SW.
8. The TSU contains State minerals located in Section 16, Township 32 North, Range 59 East.

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 (i) creating a TSU comprised of Sections 4, 9, and 16, Township 32 North, Range 59 East, 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 within two (2) years from the date of such order; (ii) vacating MBOGC Order No. 380-2011 insofar as applicable to the Application Lands; and
3. For such other or additional relief as the Board may deem appropriate.

DATED this 10th day of September 2026.

PHOENIX OPERATING LLC

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

IN THE MATTER OF THE APPLICATION OF PHOENIX OPERATING LLC, FOR AN ORDER AUTHORIZING THE DRILLING OF UP TO TWO ADDITIONAL HORIZONTAL BAKKEN/THREE FORKS FORMATION WELLS IN THE TEMPORARY SPACING UNIT ("TSU") COMPRISED OF ALL OF SECTIONS 4, 9, AND 16, TOWNSHIP 32 NORTH, RANGE 59 EAST, SHERIDAN COUNTY, MONTANA, AT ANY LOCATIONS NOT CLOSER THAN 200' (HEEL/TOE SETBACK)/500' (LATERAL SETBACK) TO THE BOUNDARIES OF SAID TSU, AND SUCH OTHER RELIEF AS THE BOARD MAY DEEM APPROPRIATE.	**MBOGC DOCKET NO.** 579-2026 **FED. DOCKET NO.** 3-2027 **APPLICATION**

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PHOENIX OPERATING LLC (the "Applicant"), 4643 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 4, 9, and 16, Township 32 North, Range 59 East, Sheridan County, Montana (the "Application Lands").
2. 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 ("MBOGC" and the "Board") Order No. _____ - 2026.
3. Lot 5 and Lot 6, E2SW, Section 4, Township 32 North, Range 59 East, of the Application Lands contain Tribal minerals.
4. Section 16, Township 32 North, Range 59 East, of the Application Lands contains State of Montana minerals.
5. Applicant requests authorization from the Board to drill up to two (2) additional horizontal Bakken/Three Forks formation wells within said TSU, at any location 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.

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 two (2) additional horizontal Bakken/Three Forks formation wells within said TSU comprising

all of Sections 4, 9, and 16, Township 32 North, Range 59 East, Sheridan County, Montana, at any location but not closer than 200' (heel/toe setback)/ 500' (lateral setback) to the exterior boundaries of said TSU; and

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

DATED this 10th day of September 2026.

PHOENIX OPERATING LLC

By Kelley Huemoeller Lewis

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

IN THE MATTER OF THE APPLICATION OF PHOENIX OPERATING LLC, FOR AN ORDER CREATING A TEMPORARY SPACING UNIT ("TSU") COMPRISED OF ALL OF SECTIONS 5, 8, AND 17, TOWNSHIP 32 NORTH, RANGE 59 EAST, 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 NO. 380-2011 INSOFAR AS APPLICABLE TO THE APPLICATION LANDS, AND SUCH FURTHER RELIEF AS THE BOARD MAY DEEM APPROPRIATE.	**MBOGC DOCKET NO.** 590-2026 **APPLICATION**

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PHOENIX OPERATING LLC (the "Applicant"), 4643 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 of Sections 5, 8, and 17, Township 32 North, Range 59 East, Sheridan County, Montana (the "Application Lands").
2. The Bakken/Three Forks formation underlying the Application Lands is presently subject to Montana Board of Oil and Gas Conservation ("MBOGC" and the "Board") Order No. 380-2011, a statewide temporary spacing order for the Bakken/Three Forks formation.
3. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the Application 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 all of Sections 5, 8, and 17, Township 32 North, Range 59 East, Sheridan County, Montana.
4. To grant the requested relief, it will be necessary to vacate MBOGC Order No. 380-2011 insofar as applicable to the Application Lands.
5. Applicant believes this request prevents waste of oil and gas, avoids drilling 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 the Board's consideration of permanent spacing and other matters relating to production from said wells.

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 (i) creating a TSU comprised of Sections 5, 8, and 17, Township 32 North, Range 59 East, 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 within two (2) years from the date of such order; (ii) vacating MBOGC Order No. 380-2011 insofar as applicable to the Application Lands; and
3. For such other or additional relief as the Board may deem appropriate.

DATED this 10th day of September 2026.

PHOENIX OPERATING LLC

By Kelley Huemoeller Lewis

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

IN THE MATTER OF THE APPLICATION OF PHOENIX OPERATING 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 5, 8, AND 17, TOWNSHIP 32 NORTH, RANGE 59 EAST, SHERIDAN COUNTY, MONTANA, AT ANY LOCATIONS NOT CLOSER THAN 200' (HEEL/TOE SETBACK)/500' (LATERAL SETBACK) TO THE BOUNDARIES OF SAID TSU, AND SUCH OTHER RELIEF AS THE BOARD MAY DEEM APPROPRIATE.	**MBOGC DOCKET NO.** 591-2026 **APPLICATION**

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PHOENIX OPERATING LLC (the "Applicant"), 4643 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 5, 8, and 17, Township 32 North, Range 59 East, Sheridan County, Montana (the "Application Lands").
2. 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 ("MBOGC" and the "Board") Order No. _____ - 2026.
3. Applicant requests authorization from the Board to drill up to three (3) additional horizontal Bakken/Three Forks formation wells within said TSU, at any location 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.

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 (3) additional horizontal Bakken/Three Forks formation wells within said TSU, at any location but not closer than 200' (heel/toe setback)/ 500' (lateral setback) to the exterior boundaries of a TSU comprised of all of Sections 5, 8, and 17, Township 32 North, Range 59 East, Sheridan County, Montana; and
3. For such other or additional relief as the Board may deem appropriate.

DATED this 10th day of September 2026.

PHOENIX OPERATING LLC

By Kelley Huemoeller Lewis
Kelley Lewis, Attorney for Applicant
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BEFORE THE BOARD OF OIL AND GAS CONSERVATION OF THE STATE OF MONTANA

IN THE MATTER OF THE APPLICATION OF PHOENIX OPERATING LLC, FOR AN ORDER CREATING A TEMPORARY SPACING UNIT ("TSU") COMPRISED OF ALL OF SECTIONS 6, 7, AND 18, TOWNSHIP 32 NORTH, RANGE 59 EAST, 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 NO. 380-2011 INSOFAR AS APPLICABLE TO THE APPLICATION LANDS, AND SUCH OTHER RELIEF AS THE BOARD MAY DEEM APPROPRIATE.	**MBOGC DOCKET NO.** 592-2026 **FED. DOCKET NO.** 4-2027 **APPLICATION**

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PHOENIX OPERATING LLC (the "Applicant"), 4643 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 6, 7 and 18, Township 32 North, Range 59 East, Sheridan County, Montana (the "Application Lands").
2. The Bakken/Three Forks formation within the Application Lands is presently subject to Montana Board of Oil and Gas Conservation ("MBOGC" and the "Board") Order No. 380-2011, a statewide temporary spacing order for the Bakken/Three Forks pool.
3. The SW1/4, Section 18, Township 32 North, Range 59 East, of the Application Lands contains Tribal minerals.
4. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the Application 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 all of Sections 6, 7, and 18, Township 32 North, Range 59 East, Sheridan County, Montana.
5. To grant the requested relief, it will be necessary to vacate MBOGC Order No. 380-2011 insofar as applicable to the Application Lands.
6. Applicant believes this request prevents waste of oil and gas, avoids drilling unnecessary wells, and protects the correlative rights of all interested parties.

7. Applicant will, within ninety (90) days of successful completion of the proposed horizontal well, file an application for the Board's consideration of permanent spacing and other matters relating to production from said well.

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 (i) creating a TSU comprised of Sections 6, 7, and 18, Township 32 North, Range 59 East, 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, (ii) providing that operations for the drilling of such well must be commenced within two (2) years from the date of such order; and (iii) vacating MBOGC Order No. 380-2011 insofar as applicable to the Application Lands; and
3. For such other or additional relief as the Board may deem appropriate.

DATED this 10th day of September 2026.

PHOENIX OPERATING LLC

By Kelley Huemoeller Lewis
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BEFORE THE BOARD OF OIL AND GAS CONSERVATION OF THE STATE OF MONTANA

IN THE MATTER OF THE APPLICATION OF PHOENIX OPERATING 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 6, 7, AND 18, TOWNSHIP 32 NORTH, RANGE 59 EAST, SHERIDAN COUNTY, MONTANA, AT ANY LOCATIONS NOT CLOSER THAN 200' (HEEL/TOE SETBACK)/500' (LATERAL SETBACK) TO THE BOUNDARIES OF SAID TSU, AND SUCH OTHER RELIEF AS THE BOARD MAY DEEM APPROPRIATE.	**MBOGC DOCKET NO.** 583-2026 **FED. DOCKET NO.** 5-2027 **APPLICATION**

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PHOENIX OPERATING LLC (the "Applicant"), 4643 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 of Sections 6, 7, and 18, Township 32 North, Range 59 East, Sheridan County, Montana (the "Application Lands").
2. 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 ("MBOGC" and the "Board") Order No. _____ - 2026.
3. The SW1/4, Section 18, Township 32 North, Range 59 East, of the Application Lands contains Tribal minerals.
4. Applicant requests authorization from the Board to drill up to three (3) additional horizontal Bakken/Three Forks formation wells within said TSU, at any location 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.

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 (3) additional horizontal Bakken/Three Forks formation wells within the TSU comprising all of Sections 6, 7, and 18, Township 32 North, Range 59 East, Sheridan County, Montana,

at any location but not closer than 200' (heel/toe setback)/ 500' (lateral setback) to the exterior boundaries of said TSU; and

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

[*SIGNATURE PAGE FOLLOWS*]

[*SIGNATURE PAGE TO APPLICATION*]

DATED this 10th day of September 2026.

PHOENIX OPERATING LLC

By Kelley Huemoeller Lewis
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BEFORE THE BOARD OF OIL AND GAS CONSERVATION OF THE STATE OF MONTANA

IN THE MATTER OF THE APPLICATION OF PHOENIX OPERATING LLC, FOR AN ORDER CREATING A TEMPORARY SPACING UNIT ("TSU") COMPRISED OF ALL OF SECTIONS 7 AND 18, TOWNSHIP 23 NORTH, RANGE 59 EAST, 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, AMENDING MBOGC ORDER NO. 237-2012 TO CLARIFY THAT SAID ORDER IS LIMITED TO THE BAKKEN/THREE FORKS FORMATION OIL AND ASSOCIATED NATURAL GAS FROM THE PETERSON #42X-18, VACATING MBOGC ORDER NO. 380-2011 INSOFAR AS APPLICABLE TO THE APPLICATION LANDS AND MBOGC ORDER NO. 294-2025, AND SUCH OTHER RELIEF AS THE BOARD MAY DEEM APPROPRIATE.	**MBOGC DOCKET NO.** 590-2026 **APPLICATION**

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PHOENIX OPERATING LLC (the "Applicant"), 4643 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 7 and 18, Township 23 North, Range 59 East, Richland County, Montana (the "Application Lands").
2. The Bakken/Three Forks formation within Section 18 of the Application Lands is subject to MBOGC Order No. 237-2012, establishing a permanent spacing unit for Bakken/Three Forks production in all of Section 13, Township 23 North, Range 58 East, and Section 18, Township 23 North, Range 59 East. The Peterson #42X-18 well is currently operated for Bakken/Three Forks production in this permanent spacing unit.
3. The Bakken/Three Forks formation within Section 7 of the Application Lands is subject to MBOGC Order No. 294-2025, establishing a temporary spacing unit for Bakken/Three

Forks production in all of Sections 7, 8, and 9, Township 23 North, Range 59 East, Richland County, Montana.

4. The Bakken/Three Forks formation within the Application Lands is subject to Montana Board of Oil and Gas Conservation ("MBOGC" and the "Board") Order No. 380-2011, a statewide temporary spacing order for the Bakken/Three Forks pool.
5. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the Application 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 all of Sections 7 and 18, Township 23 North, Range 59 East, Richland County, Montana.
6. To grant the requested relief, it will be necessary to (i) amend MBOGC Order No. 237-2012 to clarify that said order is limited to the Bakken/Three Forks formation oil and associated natural gas from the Peterson #42X-18 well, and (ii) vacate MBOGC Order No. 294-2025 and 380-2011 insofar as applicable to the Application Lands.
7. Applicant believes this request prevents waste of oil and gas, avoids drilling unnecessary wells, and protects the correlative rights of all interested parties.
8. Applicant will, within ninety (90) days of successful completion of the proposed horizontal well, file an application for the Board's consideration of permanent spacing and other matters relating to production from said well.

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 (i) creating an TSU comprised of Sections 7 and 18, Township 23 North, Range 59 East, 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 (2) years from the date of such order; (ii) amending MBOGC Order No. 237-2012 to clarify that said order is limited to the Bakken/Three Forks formation oil and associated natural gas from the Peterson #42X-18 well; (iii) vacating MBOGC Order No. 294-2025 and MBOGC Order No. 380-2011 insofar as applicable to the Application Lands; and
3. For such other or additional relief as the Board may deem appropriate.

[*SIGNATURE PAGE FOLLOWS*]

[*SIGNATURE PAGE TO APPLICATION*]

DATED this 10th day of September 2026.

PHOENIX OPERATING LLC

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

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

IN THE MATTER OF THE APPLICATION OF PHOENIX OPERATING 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 7 AND 18, TOWNSHIP 23 NORTH, RANGE 59 EAST, RICHLAND COUNTY, MONTANA, AT ANY LOCATIONS NOT CLOSER THAN 200' (HEEL/TOE SETBACK)/500' (LATERAL SETBACK) TO THE BOUNDARIES OF SAID OTSU, AND SUCH OTHER RELIEF AS THE BOARD MAY DEEM APPROPRIATE.	**MBOGC DOCKET NO.** 591- 2026 **APPLICATION**

******

PHOENIX OPERATING LLC (the "Applicant"), 4643 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 7 and 18, Township 23 North, Range 59 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 ("MBOGC" and the "Board") Order No. _____ - 2026.
2. Applicant requests authorization from the Board to drill up to three (3) additional horizontal Bakken/Three Forks formation wells within said TSU, at any location 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.

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 (3) additional horizontal Bakken/Three Forks formation wells within the TSU comprising all of Sections 7 and 18, Township 23 North, Range 59 East, Richland County, Montana, at any location but not closer than 200' (heel/toe setback)/ 500' (lateral setback) to the exterior boundaries of said TSU; and
3. For such other or additional relief as the Board may deem appropriate.

DATED this 10th day of September 2026.

PHOENIX OPERATING LLC

By Kelley Huesmoeller 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

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

IN THE MATTER OF THE APPLICATION OF PHOENIX OPERATING LLC, FOR AN ORDER CREATING A TEMPORARY SPACING UNIT ("TSU") COMPRISED OF ALL OF SECTIONS 8, 17, AND 20, TOWNSHIP 23 NORTH, RANGE 59 EAST, 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, VACATING MBOGC ORDER NOS. 238-2012, 294-2025, AND 380-2011 INSOFAR AS APPLICABLE TO THE APPLICATION LANDS, AND SUCH OTHER RELIEF AS THE BOARD MAY DEEM APPROPRIATE.	**MBOGC DOCKET NO.** 592 - 2026 **APPLICATION**

******

PHOENIX OPERATING LLC (the "Applicant"), 4643 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 8, 17, and 20, Township 23 North, Range 59 East, Richland County, Montana (the "Application Lands").
2. The Bakken/Three Forks formation within Section 17 of the Application Lands is subject to MBOGC Order No. 238-2012, establishing a permanent spacing unit for Bakken/Three Forks production in all of Sections 16 and 17, Township 23 North, Range 59 East. The Beagle #12X-17 well, established for Bakken/Three Forks production in this permanent spacing unit, has been plugged and abandoned.
3. The Bakken/Three Forks formation within Section 8 of the Application Lands is subject to MBOGC Order No. 294-2025, establishing a temporary spacing unit for Bakken/Three Forks production in all of Section 7, 8, and 9, Township 23 North, Range 59 East, Richland County, Montana.
4. The Bakken/Three Forks formation within the Application Lands is subject to Montana Board of Oil and Gas Conservation ("MBOGC" and the "Board") Order No. 380-2011, a statewide temporary spacing order for the Bakken/Three Forks pool.

5. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the Application 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 all of Sections 8, 17, and 20, Township 23 North, Range 59 East, Richland County, Montana.
6. To grant the requested relief, it will be necessary to vacate MBOGC Order No. 238-2012, MBOGC Order No. 294-2025, and MBOGC Order No. 380-2011, insofar as applicable to the Application Lands.
7. Applicant believes this request prevents waste of oil and gas, avoids drilling unnecessary wells, and protects the correlative rights of all interested parties.
8. Applicant will, within ninety (90) days of successful completion of the proposed horizontal well, file an application for the Board's consideration of permanent spacing and other matters relating to production from said well.

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 (i) creating an TSU comprised of Sections 8, 17, and 20, Township 23 North, Range 59 East, 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 (2) years from the date of such order; and (ii) vacating MBOGC Order No. 238-2012, MBOGC Order No. 294-2025, and MBOGC Order No. 380-2011 insofar as applicable to the Application Lands; and
3. For such other or additional relief as the Board may deem appropriate.

DATED this 10th day of September 2026.

PHOENIX OPERATING LLC

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

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

IN THE MATTER OF THE APPLICATION OF PHOENIX OPERATING 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 8, 17, AND 20, TOWNSHIP 23 NORTH, RANGE 59 EAST, RICHLAND COUNTY, MONTANA, AT ANY LOCATIONS NOT CLOSER THAN 200' (HEEL/TOE SETBACK)/500' (LATERAL SETBACK) TO THE BOUNDARIES OF SAID TSU, AND SUCH OTHER RELIEF AS THE BOARD MAY DEEM APPROPRIATE.	**MBOGC DOCKET NO.** 593-2026 **APPLICATION**

******

PHOENIX OPERATING LLC (the "Applicant"), 4643 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 8, 17, and 20, Township 23 North, Range 59 East, Richland County, Montana (the "Application Lands").
2. 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 ("MBOGC" and the "Board") Order No. _____ - 2026.
3. Applicant requests authorization from the Board to drill up to three (3) additional horizontal Bakken/Three Forks formation wells within said TSU, at any location 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.

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 (3) additional horizontal Bakken/Three Forks formation wells within said TSU, at any location but not closer than 200' (heel/toe setback)/ 500' (lateral setback) to the exterior boundaries of a TSU comprised of all of Sections 8, 17, and 20, Township 23 North, Range 59 East, Richland County, Montana; and
3. For such other or additional relief as the Board may deem appropriate.

DATED this 10th day of September 2026.

PHOENIX OPERATING LLC

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

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

IN THE MATTER OF THE APPLICATION OF PHOENIX OPERATING LLC, FOR AN ORDER CREATING A TEMPORARY SPACING UNIT ("TSU") COMPRISED OF ALL OF SECTIONS 9, 16, AND 21, TOWNSHIP 23 NORTH, RANGE 59 EAST, 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, VACATING MBOGC ORDER NOS. 238-2012, 294-2025, AND 380-2011 INSOFAR AS APPLICABLE TO THE APPLICATION LANDS, AND SUCH OTHER RELIEF AS THE BOARD MAY DEEM APPROPRIATE.	**MBOGC DOCKET NO.** 594-2026 **APPLICATION**

******

PHOENIX OPERATING LLC (the "Applicant"), 4643 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 of Sections 9, 16, and 21, Township 23 North, Range 59 East, Richland County, Montana (the "Application Lands").
2. The Bakken/Three Forks formation within Section 16 of the Application Lands is subject to MBOGC Order No. 238-2012, establishing a permanent spacing unit for Bakken/Three Forks production in all of Sections 16 and 17, Township 23 North, Range 59 East. The Beagle #12X-17 well, established for Bakken/Three Forks production in this permanent spacing unit, has been plugged and abandoned.
3. The Bakken/Three Forks formation within Section 9 of the Application Lands is subject to MBOGC Order No. 294-2025, establishing a temporary spacing unit for Bakken/Three Forks production in Section 7, 8, and 9, Township 23 North, Range 59 East.
4. The Bakken/Three Forks formation within the Application Lands is subject to Montana Board of Oil and Gas Conservation ("MBOGC" and the "Board") Order No. 380-2011, a statewide temporary spacing order for the Bakken/Three Forks pool.
5. Portions of Section 9, Township 23 North, Range 59 East, and Section 21, Township 23 North, Range 59 East, of the Application Lands contain federal minerals.

6. To more efficiently and economically recover Bakken/Three Forks formation reserves underlying the Application 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 all of Sections 9, 16, and 21, Township 23 North, Range 59 East, Richland County, Montana.
7. To grant the requested relief, it will be necessary to vacate MBOGC Order No. 238-2012, MBOGC Order No. 294-2025, and MBOGC Order No. 380-2011 insofar as applicable to the Application Lands.
8. Applicant believes this request prevents the waste of oil and gas, avoids the drilling of unnecessary wells, and protects the correlative rights of all interested parties.
9. Applicant will, within ninety (90) days of successful completion of the proposed horizontal well, file an application for the Board's consideration of permanent spacing and other matters relating to production from said well.
10. The TSU contains Federal minerals in Section 9, Township 23 North, Range 59 East and Section 21, Township 23 North, Range 59 East.

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 (i) creating a TSU comprised of Sections 9, 16, and 21, Township 23 North, Range 59 East, 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 (2) years from the date of such order; and (ii) vacating MBOGC Order No. 238-2012, MBOGC Order No. 294-2025, and MBOGC Order No. 380-2011 insofar as applicable to the Application Lands; and
3. For such other or additional relief as the Board may deem appropriate.

DATED this 10th day of September 2026.

PHOENIX OPERATING LLC

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

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

IN THE MATTER OF THE APPLICATION OF PHOENIX OPERATING 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 9, 16, AND 21, TOWNSHIP 23 NORTH, RANGE 59 EAST, RICHLAND COUNTY, MONTANA, AT ANY LOCATIONS NOT CLOSER THAN 200' (HEEL/TOE SETBACK)/500' (LATERAL SETBACK) TO THE BOUNDARIES OF SAID TSU, AND SUCH OTHER RELIEF AS THE BOARD MAY DEEM APPROPRIATE.	**MBOGC DOCKET NO.** 595 - 2026 **FED. DOCKET NO.** / **APPLICATION**

******

PHOENIX OPERATING LLC (the "Applicant"), 4643 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 of Sections 9, 16, and 21, Township 23 North, Range 59 East, Richland County, Montana (the "Application Lands").
2. 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 ("MBOGC" and the "Board") Order No. _____ - 2026.
3. Portions of Section 9, Township 23 North, Range 59 East, and Section 21, Township 23 North, Range 59 East, of the Application Lands contain federal minerals.
4. Applicant requests authorization from the Board to drill up to three (3) additional horizontal Bakken/Three Forks formation wells within said TSU, at any location 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.

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 (3) additional horizontal Bakken/Three Forks formation wells within the TSU comprising all of Sections 9, 16, and 21, Township 23 North, Range 59 East, Richland County,

Montana, at any location but not closer than 200' (heel/toe setback)/ 500' (lateral setback) to the exterior boundaries of said TSU; and

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

DATED this 10th day of September 2026.

PHOENIX OPERATING LLC

By Kelley Huemoeller Lewis

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

THE MONTANA DEPARTMENT OF NATURAL RESOURCES & CONSERVATION
Montana Board of Oil & Gas Conservation

2535 St. Johns Avenue
Billings, MT 59102
(406) 656-0040
Dnrc.mt.gov/BOGC

September 21, 2026

Tallgrass Water North Dakota, LLC
370 Van Gordon Street
Lakewood, CO 80228

Re: Pending Notice of Intent to Change Operator and Request to Appear

Dear Tallgrass Water North Dakota, LLC:

This letter is regarding the Notice of Intent to Change Operator request from Caliber North Dakota LLC to Tallgrass Water North Dakota, LLC (Tallgrass) that was recently submitted to the Board of Oil and Gas Conservation (Board).

The Board and its staff have reviewed the request and the transfer involves a commercial disposal well for which the primary purpose is for-profit disposal of oil and gas wastes not generated by the well operator. Due to the Board's transfer of plugging and reclamation policy, the approval of the change of operator request is being referred to the Board. The policy is enclosed. Tallgrass is requested to appear at the **October 15, 2026**, public hearing. At that time, the Board will determine if Tallgrass's proposed well plugging and reclamation bond is adequate prior to the administrative review and approval of the change of operator request. Tallgrass and its attorney should review the enclosed policy for the suggested information to provide to the Board.

Please take note that corporations, partnerships, limited-liability companies (LLCs), or any other legal entity that is not a natural person cannot appear before the Board except through an attorney licensed to practice law in the State of Montana. Failure of a designated and duly licensed legal representative to appear at the time and place identified in this hearing notice may result in imposition of sanctions for failure to appear before the Board.

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

Sincerely,

Benjamin Jones
Administrator / Petroleum Engineer

cc: Caliber North Dakota LLC

612-2026

FORM NO. 20 R 10/09

RECEIVED
SEP 09 2026
MONTANA BOARD OF OIL & GAS CONSERVATION • BILLINGS

SUBMIT IN QUADRUPLICATE TO
MONTANA BOARD OF OIL AND GAS CONSERVATION
2535 ST. JOHNS AVENUE BILLINGS, MONTANA 59102

ARM 36.22.307
36.22.1308

Notice of Intent to Change Operator

The undersigned Transferor hereby notifies the Board of Oil and Gas Conservation of its intention to transfer ownership and/or operation of the following wells to the undersigned Transferee:

Lease Name:	Lease type:(Private, State, Federal, Indian)
VERSCHOOT 1-19 SWD	Private
County:	**Field name:**
Richland	Lane

Description of wells: Include API well number, well name and number, and exact location of the well including Township, Range, Section, quarter-quarter and footage measurements, and lease type . (Federal, Indian, Private, State) Attach additional sheets as necessary.

API # 25-083-21866-00-00, Verschoot 1-19 SWD, Township 23N, Range 54E, Section 19, NW SW, Surface 2075 FLS, 696FWL Injection/Disposal.

Number of Wells to be Transferred: 1 Effective Date of Transfer: 1/2/2026

Transferor's Statement:
I hereby designate the Transferee named herein as the owner and/or operator of record of the above described well(s). I acknowledge that the Transferor continues to be responsible for said well(s) and all associated equipment and facilities until such time as this transfer is approved by the Montana Board of Oil and Gas Conservation. I certify that the information contained herein is true and correct:

Company Caliber Midstream North Dakota LLC
Street Address 455 North Poplar St
P.O. Box
City, State, ZIP Casper WY 82604
Signed Robert Stamp
Print Name Robert Stamp
Title Attorney in Fact
Telephone (307) 266-0345
Date 8/11/26

Transferee's Statement:
I hereby accept the designation of operator/owner for the above described well(s). I understand that this transfer will not be approved until the Transferee has complied with the Board's bonding requirements. I acknowledge that under Section 82-11-101 MCA, the Transferee herein is responsible for the costs of proper plugging and restoration of the surface of the well(s) described above. I certify that the information contained herein is true and correct:

Company Tallgrass Water North Dakota, LLC
Street Address 370 Van Gordon Street
P.O. Box
City, State, ZIP Lakewood, CO 80228
Signed Eric R. Cook
Print Name Eric R. Cook
Title Vice President
Telephone (303) 763 3524
Date 8/25/2026

BOARD USE ONLY

Approved
Date
Name Title
Oper. No. 791 Bond No. T1

Field Office Review	Date	Initial
Inspection		
Records Review		
Operations		

Oper No. Bond No.

#8211

612-2026

Instructions for Form 20

This form is used to change the Operator of Record for wells. Complete the front portion of this form as indicated.

To transfer a number of wells please type: "See attached list" in the **Description of Wells** area and include the list of wells as an attachment.

The list of wells should be separated by lease and sorted by Township, Range, and Section. Wells should be identified as Federal, Indian, Private, or State under lease type. **Injection/SWD** wells should be identified as such. Plugged and Abandoned wells should not be included for transfer. The list should be in the following format:

API Number Lease Name Well Number Twp. Rge. Sec. Qtr Qtr Footage Lease Type

The form must be signed by both the current owner/operator (transferor) and the proposed new owner/operator (transferee). The current operator of record will continue to be responsible for any wells and associated equipment or facilities until the transfer is approved by an authorized agent of the Montana Board of Oil and Gas Conservation.

For large change of operator submissions, if possible, please include a diskette containing the data list.

The Montana Board of Oil and Gas Conservation may withhold approval of the transfer until the well(s) made the subject of this form is (are) in substantial compliance with all applicable Board rules. All production reports, notices, forms, logs, samples, or other information required by Board law, rule, or order must be on file with the Board. The transferee must be in compliance with the Board's bonding requirements, as provided in Rules 36.22.1308 and 1408 ARM, before the transfer can be approved. A copy of the approved or disapproved Form 20 will be returned to each party.

Parties transferring wells are advised that the identity of responsible persons as defined by Section 82-11-101, MCA, will be determined by the Board's records.

If this form relates to a proposed change in the operator of record for a State of Montana oil and gas lease issued by the Montana Board of Land Commissioners, the parties should send a separate copy of this form to the Montana Department of Natural Resources and Conservation, Trust Lands Management Division, Minerals Management Bureau, 1625 Eleventh Avenue, P.O. Box 201601, Helena Montana 59620-1601.

The proposed new operator should have a current copy of the rules and laws of the Montana Board of Oil and Gas Conservation. Copies of the rules and laws may be obtained from any Board office, or are available on the Internet at http://www.bogc.dnrc.mt.gov.

NOTICE: False or inaccurate information can void the transfer of a well or wells to another operator's bond. Be sure to verify the accuracy of all well descriptions and other information supplied with this form.

BOARD USE ONLY	CONDITIONS OF APPROVAL

612-2026

THE MONTANA DEPARTMENT OF NATURAL RESOURCES & CONSERVATION
Montana Board of Oil & Gas Conservation

2535 St. Johns Avenue
Billings, MT 59102
(406) 656-0040
Dnrc.mt.gov/BOGC

September 21, 2026

Sun Coulee, LLC
40 71 Ranch Lane
Martinsdale, MT 59053

Re: Pending Notice of Intent to Change Operator and Request to Appear

Dear Sun Coulee, LLC:

This letter is regarding the Notice of Intent to Change Operator request from Cline Production Company to Sun Coulee, LLC (Sun Coulee) that was recently emailed to the Board of Oil and Gas Conservation (Board). The originally signed Notice of Intent to Change Operator request must be received prior to the October 15, 2026, public hearing.

The request and the approval of the request will result in 5 or more inactive wells on Sun Coulee's multiple well bond. Due to the Board's transfer of plugging and reclamation policy, the approval of the change of operator request is being referred to the Board. The policy is enclosed. Sun Coulee is requested to appear at the **October 15, 2026**, public hearing. At that time, the Board will determine if Sun Coulee's current $50,000 multiple well plugging and reclamation bond is adequate prior to the administrative review and approval of the change of operator request. Sun Coulee and its attorney should review the enclosed policy for the suggested information to provide to the Board.

Please take note that corporations, partnerships, limited-liability companies (LLCs), or any other legal entity that is not a natural person cannot appear before the Board except through an attorney licensed to practice law in the State of Montana. Failure of a designated and duly licensed legal representative to appear at the time and place identified in this hearing notice may result in imposition of sanctions for failure to appear before the Board.

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

Sincerely,

Benjamin Jones
Administrator / Petroleum Engineer

cc: Cline Production Company

616-2026

FORM NO. 20 R 10/09 | SUBMIT IN QUADRUPLICATE TO | ARM 36.22.307 36.22.1308

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

Notice of Intent to Change Operator

The undersigned Transferor hereby notifies the Board of Oil and Gas Conservation of its intention to transfer ownership and/or operation of the following wells to the undersigned Transferee:

Lease Name:	Lease type:(Private, State, Federal, Indian)
BN	**Private**
County: **Garfield**	**Field name:** **Studhorse**

Description of wells: Include API well number, well name and number, and exact location of the well including Township, Range, Section, quarter-quarter and footage measurements, and lease type . (Federal, Indian, Private, State) Attach additional sheets as necessary.

2503321095 : BN 12-23 : 13N - 33E - 23 SW NW 1985 FNL, 642 FWL : Private
2503321121 : BN 12-25 : 13N - 33E - 25 SW NW 1650 FNL, 860 FWL : Private
2503321098 : BN 11-25 : 13N - 33E - 25 NW NW 330 FNL, 990 FWL : Private
2503321110 : BN 11X-25 : 13N - 33E - 25 NW NW 330 FNL, 330 FWL : Private

Number of Wells to be Transferred: 4 Effective Date of Transfer: 1-Aug-26

Transferor's Statement:
I hereby designate the Transferee named herein as the owner and/or operator of record of the above described well(s). I acknowledge that the Transferor continues to be responsible for said well(s) and all associated equipment and facilities until such time as this transfer is approved by the Montana Board of Oil and Gas Conservation. I certify that the information contained herein is true and correct:

Company **Cline Production Company**
Street Address
P.O. Box **20736**
City, State, ZIP **Billings, MT, 59104**
Signed
Print Name **Alfred Cline Jr**
Title **President**
Telephone (**406**) **254-9496**
Date 1-Aug-26

Transferee's Statement:
I hereby accept the designation of operator/owner for the above described well(s). I understand that this transfer will not be approved until the Transferee has complied with the Board's bonding requirements. I acknowledge that under Section 82-11-101 MCA, the Transferee herein is responsible for the costs of proper plugging and restoration of the surface of the well(s) described above. I certify that the information contained herein is true and correct:

Company **Sun Coulee, LLC**
Street Address **40 71 Ranch LN**
P.O. Box
City, State, ZIP **Martindale, MT 59053**
Signed Errol T. Galt
Print Name Errol T. Galt
Title Managing Member
Telephone (406) 220-3312
Date 8/1/2026

BOARD USE ONLY

Approved
Date
Name Title
Oper. No. 1449 Bond No. VI, MI

Field Office Review	Date	Initial
Inspection		
Records Review		
Operations		

Oper No. 915 Bond No.

8209

616-2026

Instructions for Form 20

This form is used to change the Operator of Record for wells. Complete the front portion of this form as indicated.

To transfer a number of wells please type: "See attached list" in the **Description of Wells** area and include the list of wells as an attachment.

The list of wells should be separated by lease and sorted by Township, Range, and Section. Wells should be identified as **F**ederal, **I**ndian, **P**rivate, or **S**tate under lease type. **Injection/SWD** wells should be identified as such. Plugged and Abandoned wells should not be included for transfer. The list should be in the following format:

API Number	Lease Name	Well Number	Twp. Rge. Sec.	Qtr Qtr	Footage	Lease Type

The form must be signed by both the current owner/operator (transferor) and the proposed new owner/operator (transferee). The current operator of record will continue to be responsible for any wells and associated equipment or facilities until the transfer is approved by an authorized agent of the Montana Board of Oil and Gas Conservation.

For large change of operator submissions, if possible, please include a diskette containing the data list.

The Montana Board of Oil and Gas Conservation may withhold approval of the transfer until the well(s) made the subject of this form is (are) in substantial compliance with all applicable Board rules. All production reports, notices, forms, logs, samples, or other information required by Board law, rule, or order must be on file with the Board. The transferee must be in compliance with the Board's bonding requirements, as provided in Rules 36.22.1308 and 1408 ARM, before the transfer can be approved. A copy of the approved or disapproved Form 20 will be returned to each party.

Parties transferring wells are advised that the identity of responsible persons as defined by Section 82-11-101, MCA, will be determined by the Board's records.

If this form relates to a proposed change in the operator of record for a State of Montana oil and gas lease issued by the Montana Board of Land Commissioners, the parties should send a separate copy of this form to the Montana Department of Natural Resources and Conservation, Trust Lands Management Division, Minerals Management Bureau, 1625 Eleventh Avenue, P.O. Box 201601, Helena Montana 59620-1601.

The proposed new operator should have a current copy of the rules and laws of the Montana Board of Oil and Gas Conservation. Copies of the rules and laws may be obtained from any Board office, or are available on the Internet at http://www.bogc.dnrc.mt.gov.

NOTICE: False or inaccurate information can void the transfer of a well or wells to another operator's bond. Be sure to verify the accuracy of all well descriptions and other information supplied with this form.

BOARD USE ONLY	CONDITIONS OF APPROVAL

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FORM NO. 20 R 10/09 | SUBMIT IN QUADRUPLICATE TO | ARM 36.22.307 36.22.1308

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

Notice of Intent to Change Operator

The undersigned Transferor hereby notifies the Board of Oil and Gas Conservation of its intention to transfer ownership and/or operation of the following wells to the undersigned Transferee:

Lease Name:	Lease type:(Private, State, Federal, Indian)
GPE 35-13-33 BN	**Private**
County: **Garfield**	**Field name:** **Gumbo Ridge**

Description of wells: Include API well number, well name and number, and exact location of the well including Township, Range, Section, quarter-quarter and footage measurements, and lease type . (Federal, Indian, Private, State) Attach additional sheets as necessary.

2508721216 : BN 12-35 : 13N - 33E - 35 C SW NW 1980 FNL, 660 FWL : Private
2508721261 : BN 11-35 : 13N - 33E - 35 NE NW NW 659 FNL, 661 FWL : Private
2508721270 : BN 13-35 : 13N - 33E - 35 NW NW SW 2000 FSL, 545 FWL : Private
2508721288 : BN 43-34 : 13N - 33E - 34 E2 NE SE 1980 FSL, 330 FEL : Private
2508721271 : Unit 42-34 : 13N - 33E - 34 S2 SE NE 1991 FNL, 660 FEL : Private

Number of Wells to be Transferred: 5 Effective Date of Transfer: 1-Aug-26

Transferor's Statement:

I hereby designate the Transferee named herein as the owner and/or operator of record of the above described well(s). I acknowledge that the Transferor continues to be responsible for said well(s) and all associated equipment and facilities until such time as this transfer is approved by the Montana Board of Oil and Gas Conservation. I certify that the information contained herein is true and correct:

Company **Cline Production Company**
Street Address
P.O. Box **20736**
City, State, ZIP **Billings, MT, 59104**
Signed
Print Name **Alfred Cline Jr**
Title **President**
Telephone (**406**) **254-9496**
Date 1-Aug-26

Transferee's Statement:

I hereby accept the designation of operator/owner for the above described well(s). I understand that this transfer will not be approved until the Transferee has complied with the Board's bonding requirements. I acknowledge that under Section 82-11-101 MCA, the Transferee herein is responsible for the costs of proper plugging and restoration of the surface of the well(s) described above. I certify that the information contained herein is true and correct:

Company **Sun Coulee, LLC**
Street Address **40 71 Ranch LN**
P.O. Box
City, State, ZIP **Martinsdale, MT 59053**
Signed Errol T. Galt
Print Name Errol T. Galt
Title Managing Member
Telephone (406) 220-3312
Date 8/1/2026

BOARD USE ONLY

Approved
Date
Name Title
Oper. No. 1449 Bond No. VI, MI

Field Office Review	Date	Initial
Inspection		
Records Review		
Operations		

Oper No. 915 Bond No.

#9210

616-2026

Instructions for Form 20

This form is used to change the Operator of Record for wells. Complete the front portion of this form as indicated.

To transfer a number of wells please type: "See attached list" in the **Description of Wells** area and include the list of wells as an attachment.

The list of wells should be separated by lease and sorted by Township, Range, and Section. Wells should be identified as **F**ederal, **I**ndian, **P**rivate, or **S**tate under lease type. **Injection/SWD** wells should be identified as such. Plugged and Abandoned wells should not be included for transfer. The list should be in the following format:

API Number Lease Name Well Number Twp. Rge. Sec. Qtr Qtr Footage Lease Type

The form must be signed by both the current owner/operator (transferor) and the proposed new owner/operator (transferee). The current operator of record will continue to be responsible for any wells and associated equipment or facilities until the transfer is approved by an authorized agent of the Montana Board of Oil and Gas Conservation.

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