

PERMITTING AUDIT REPORT

January-June 2026

Marathon Oil Company / Bakken Assets

Prepared By:

Hanna Warlick – Managing Consultant
Jaimy Karacaoglu – Senior Consultant

TRINITY CONSULTANTS

1999 Broadway
Suite 820
Denver, Colorado 80202
720.638.7647

July 2026

Project 240601.0123



TABLE OF CONTENTS

INTRODUCTION	1
PERMITTING AUDIT	2
APPENDIX A. APPLICATIONS REVIEWED: JANUARY-JUNE 2026	A
APPENDIX B. NON-COMPLIANCE ITEM DESCRIPTIONS	B

INTRODUCTION

The Marathon Oil Company Consent Decree (Civil Action No. 1:24-cv-136) ("Consent Decree") requires third-party audits for facilities on the Fort Berthold Indian Reservation in North Dakota and New Well Pads as defined by the Consent Decree. Such audit shall be consistent with the Third-Party Audit Work Plan Version 1.0 and shall include reviewing (a) Marathon's permit applications for all Air Permit Facilities (the "Permitting Audit").

Following the Permitting Audit, Trinity has prepared the attached Third-Party Audit Report ("Audit Report"). The Audit Report includes the following: (a) description of the work completed; (b) the number of permit applications with identified non-compliance with the Emissions Calculations SOP; and (c) recommended corrective action for the identified non-compliance.

This Audit Report covers the semi-annual period ending June 30, 2026.

This Permitting Audit is based on an approved Third-Party Audit Plan provided by Marathon and is detailed as noted below:

- ▶ Obtain copies of each Part 2 Registration and Permit application subject to the Scope of this Audit (defined in Third-Party Audit Plan) along with supporting documentation including:
 - Anticipated oil, water and gas production rates;
 - Anticipated flare volumes;
 - Anticipated oil loading volumes;
 - Anticipated VRU availability;
 - Site specific or representative samples used;
 - List of onsite equipment and operating conditions;
 - Process flow diagrams;
 - Planned maintenance list (for activities listed in the Emissions Calculation SOP); and
 - Documentation for any other model input or information used for the Permit application being reviewed.
- ▶ Review all inputs to emissions process models and emissions calculations to ensure compliance with approved Emissions Calculations SOP including:
 - Use of acceptable decline curve;
 - Anticipated oil, water and gas production values;
 - Anticipated flare volumes;
 - Anticipated oil loading volumes;
 - Anticipated VRU availability;
 - Equipment operating conditions used in process models;
 - Site specific or representative sample data accuracy in model;
 - Any other inputs to the process model; and
 - Overall compliance with the Emissions Calculations SOP.
- ▶ Review all emissions calculations completed for Permit application.

As part of this Permitting Audit, Trinity reviewed the information listed above as provided by Marathon for six (6) permit applications, listed in Appendix A. Calculations were checked for consistency with the Emissions Calculations SOP version 4.0, dated January 26, 2026. None of those applications had identified non-compliance items as indicated in Appendix B.

APPENDIX A. APPLICATIONS REVIEWED: JANUARY-JUNE 2026

Marathon Bakken Permitting Audit
Applications Reviewed

ID Number	Air Permit Name	Facility Name	Date Review Completed	Number of Non-Compliances
4.07	CORA 2 CTB	Cora 2 CTB	2/13/2026	0
4.08	LILLIAN USA CTB	Lillian CTB	2/20/2026	0
4.09	WEIDMAN USA 11-15TFH AND LUTHER USA CTB	Luther USA CTB	3/9/2026	0
4.10	WEIDMAN USA 11-15TFH AND LUTHER USA CTB	Weidman USA 11-15TFH	3/9/2026	0
4.11	BANTA USA CTB AND RATCLIFFE USA 11-13H	Banta USA CTB	4/20/2026	0
4.11.1	BANTA USA CTB AND RATCLIFFE USA 11-13H [Update]	Banta USA CTB [Update]	5/1/2026	0

APPENDIX B. NON-COMPLIANCE ITEM DESCRIPTIONS

Marathon Bakken Permitting Audit
Noncompliance Items

Item Number	Equipment or Process	Facility Name(s)	Emissions SOP or Management System SOP Requirement	Description of Non Compliance with SOPs	SOP Reference	Underestimates PTE or Actual Emissions (Y/N)	Suggested Corrective Action	Date Marathon was Notified	Corrective Action Taken	Explanation if Corrective Action Differs from Suggested Corrective Action	Target Completion Date	Actual Completion Date