

**From:** [Mick Thomas](#)  
**To:** [Fugate, Kristina](#); [Kourtney Romine](#)  
**Subject:** FW: Contested Case Hearing to Define Integration  
**Date:** Tuesday, December 22, 2020 04:03:22 PM

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**From:** Mick Thomas  
**Sent:** Tuesday, December 22, 2020 4:03 PM  
**To:** Richard Brown <[richard@weiserbrown.email](mailto:richard@weiserbrown.email)>  
**Cc:** Martin Bilbao <[martin@bilbaoco.com](mailto:martin@bilbaoco.com)>  
**Subject:** RE: Contested Case Hearing to Define Integration

Hi Richard,

IDL's mailing included the operator and those listed as uncommitted mineral interest owners in 2016-OGR-01-001. Those names and addresses were included in the 2016 application from the previous operator; the previous operator did not submit a list of additional mineral interest owners in that matter. Rather it is my understanding that the former operator, as the entity with the right to produce from all leased tracts, represented the interests of the lessors. I don't know whether Snake River also plans to represent the interests of its lessors in this subsequent proceeding.

If you are aware of any mineral interest owners who are no longer lessors to Snake River, or current lessors who need or would prefer to receive notice directly from IDL, you or they can provide their name, address, and contact information to IDL to receive these notices.

Because the other portions of your e-mail address the substantive question of this contested case, I will submit this to the hearing officer for inclusion in the record.

Regards,

**Mick Thomas**  
**Minerals, Public Trust, Oil & Gas**  
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**From:** Richard Brown <[richard@weiserbrown.email](mailto:richard@weiserbrown.email)>  
**Sent:** Tuesday, December 22, 2020 12:18 PM  
**To:** Mick Thomas <[mthomas@idl.idaho.gov](mailto:mthomas@idl.idaho.gov)>  
**Cc:** Martin Bilbao <[martin@bilbaoco.com](mailto:martin@bilbaoco.com)>; Richard Brown <[richard@weiserbrown.email](mailto:richard@weiserbrown.email)>

**Subject:** FW: Contested Case Hearing to Define Integration

Mick-We got the attached announcement of the contested case and I just saw a hearing officer has been appointed. One of the royalty owners in the Barlow unit who wants a second well got wind of it. She was curious why only integrated owners were notified and not those who leased? You might recall Irene Shaver. See below email from her and she basically asks the same question that all of my partners are asking. Why has IDL pushed for a contested case hearing to define what the integration of a spacing unit covers when it says it clearly in statute? We remain perplexed by this turn of events. We trust this definition was freely shared with the commissioners in advance of the recent special hearing and executive session. "The department, upon the application of any owner in that proposed spacing unit, shall order integration of all tracts or interests in the spacing unit for drilling of a well or wells, development and operation thereof and for the sharing of production therefrom." I understand this process might be driven by others. My partners would like to understand how this process has occurred and what, if any, precedent exists to cause this hearing. Regards-Richard Brown

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**From:** Irene Shaver <[bushmurphy@hotmail.com](mailto:bushmurphy@hotmail.com)>  
**Sent:** Saturday, December 19, 2020 8:13 AM  
**To:** Richard Brown <[richard@weiserbrown.email](mailto:richard@weiserbrown.email)>  
**Subject:** Re: Number of acres

I looked at the website for Idaho Oil and Gas Commission. Their legal definition of integration says "In the absence of voluntary integration, the department, upon the application of any owner in that proposed spacing unit, shall order integration of all tracts or interests in the spacing unit for drilling of a well or wells, development and operation thereof and for the sharing of production therefrom. "

This WELLS!

I also looked at their letter they said they sent out to all people that had expressed interest and all mineral holders. I am not on that list and neither are several others including Barlow, Haagensen, Jennings and probably more.