From:	James Piotrowski
To:	Hearing Officer Mailbox; Mick Thomas; Kourtney Romine; James Thum; mike@smithmalek.com; Fugate, Kristina;
	External - Joy M. Vega; Molly Garner; edinst@tds.net; steve.rapanos@trendwellenergy.com;
	sherrygordon5@gmail.com; mc@fmtc.com
Subject:	RE: Contested Case Proceeding Re: Barlow #2-14 Well
Date:	Tuesday, February 09, 2021 12:59:01 PM
Attachments:	Motion to Continue.docx

Attached please find a Motion to Continue Hearing Date. This seeks to reschedule the February 24 date currently set for a hearing in this matter, which I hope we can discuss at tomorrow's prehearing conference.

## James Piotrowski

From: Hearing Officer Mailbox <hearing.officer@ag.idaho.gov>
Sent: Wednesday, January 27, 2021 3:46 PM
To: mthomas@idl.idaho.gov; kromine@idl.idaho.gov; jthum@idl.idaho.gov; mike@smithmalek.com;
Fugate, Kristina <kristina.fugate@ag.idaho.gov>; Vega, Joy <joy.vega@ag.idaho.gov>; James
Piotrowski <james@idunionlaw.com>; Molly Garner <Molly@idunionlaw.com>; edinst@tds.net;
steve.rapanos@trendwellenergy.com; sherrygordon5@gmail.com; mc@fmtc.com
Subject: Contested Case Proceeding Re: Barlow #2-14 Well

Attached is a Notice Scheduling Pre-Hearing Conference and Notice Scheduling Hearing.

Bekah Serrato Legal Secretary Fair Hearings Unit Contracts and Administrative Law Office of the Attorney General 208-334-4559 James M. Piotrowski Marty Durand Piotrowski Durand, PLLC P.O. Box 2864 Boise, Idaho 83701 Telephone: (208)331-9200 Facsimile: (208)331-9201 Email: James@idunionlaw.com Email: Marty@idunionlaw.com

Attorneys for CAIA

## BEFORE THE IDAHO OIL AND GAS CONSERVATION COMMISSION

)

In the Matter of:

Determining whether the integration order in Docket No. CC-2016-OGR-01-001 applies to the permitted proposed Barlow #2-14 well ) Docket No. CC-2020-OGR-01-003

) Appeal No. 20-72167

) MOTION TO CONTINUE HEARING

COMES NOW Citizens Allied for Integrity and Accountability (CAIA) and each of its members including but not limited to Brad and Angela Barlow, Sue Bixby, Cookie Atkins, Janie Rodriquez, Melvin and Terri Person, Jan and James Mitchell, Bruce Burrup, Dale Verhaeghe, Linda Dernoncourt, William Tolbert, Julie Fugate, and Joey and Brenda Ishida and hereby moves the hearing officer to continue the hearing set in this matter to another date. As grounds for and in support of such request, CAIA and its members would show as follows:

1. Counsel for CAIA and its members has a scheduling conflict with the proposed hearing date of February 24, 2021.

2. Counsel for CAIA has submitted proposed alternative hearing dates to the other parties listed in the Hearing Officer's notice of service.

3. The parties, through their counsel have agreed that the dates of "the afternoon of March 9," or any time on March 10, 2021 would be available for them, or in the alternative, have stated that they do not intend to participate in the hearing. Counsel for CAIA provided other

available dates. Despite this effort, counsel for Idaho Department of Lands and for Snake River Oil and Gas would only agree to those two dates, and did not offer any others. While undersigned counsel has made best effort to secure at least three alternative dates, as required by the Hearing Officer's order, he was unable to secure opposing counsels' agreement to at least three dates.

WHEREFORE, CAIA and its members seek a continuance of the hearing in this matter until

March 9 or 10, or until such other date as the Hearing Officer might select.

DATED this 9th day of February, 2020.

## PIOTROWSKI DURAND, PLLC

/s/ James M. Piotrowski By: James M. Piotrowski Attorneys for CAIA

## CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing document to be served on the parties indicated below, via the method indicated, this 22<sup>nd</sup> day of December, 2020.

Idaho Oil & Gas Commission Attn: Mick Thomas 300 N. 6th Street, Suite 103 PO Box 83720 Boise, ID 83720 <u>kromine@idl.idaho.gov</u> mthomas@idl.idaho.gov

Snake River Oil and Gas c/o Michael Christian Smith & Malek, PLLC 101 S. Capitol Blvd, Suite 930 Boise, ID 83702 <u>mike@smithmalek.com</u> <u>sarah@smithmalek.com</u> U.S. Mail Hand Delivery Certified Mail E-Mail

U.S. Mail Hand Delivery Certified Mail E-Mail

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Kristina Fugate Deputy Attorney General PO Box 83720 Boise ID 83720-0010 kristina.fugate@ag.idaho.gov

James Thum Idaho Department of Lands PO Box 83720 Boise ID 83720-0050 jthum@idl.idaho.gov

Chuck Broscious Environmental Defense Institute P.O. Box 220 Troy, ID 83871 Email: <u>edinst@tds.net</u>

Steve Rapanos Trendwell Energy Corp. P.O. Box 560 Rockford, MI 49341 Email: <u>steve.rapanos@trendwellenergy.com</u>

<u>/s/ James M. Piotrowski</u> James M. Piotrowski Attorneys for CAIA U.S. Mail Hand Delivery Certified Mail E-Mail

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