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BEFORE THE IDAHO DEPARTMENT OF LANDS

In the matter of the Application of Snake)	
River Oil and Gas, LLC for Spacing Order,)	Case No. CC-2020-OGR-01-001
)	
Snake River Oil and Gas, LLC, applicant.)	MOTION TO CONTINUE DEADLINE
)	
_____)	

COMES NOW Citizens Allied for Integrity and Accountability (CAIA) and hereby moves the Administrator and the Department to continue the deadline for submission of objections, responses and pre-hearing motions in the above-captioned case. The Administrator has already continued the pre-hearing conference and hearing in this matter, and no party will be prejudiced by continuing the deadline to submit objections, responses and motions. The public health concerns that caused the Administrator to continue the hearing will, however, be jeopardized by maintaining the deadline for submissions.

On March 18, 2020, the Administrator continued the hearing and pre-hearing conference in this case due to the public health crisis which led Governor Little to issue a Proclamation declaring an emergency. The point of that Proclamation was to reinforce “social distancing,” and to ease the burdens faced by citizens in the face of a public health emergency.

CAIA and its counsel represent and otherwise work with dozens of mineral rights owners in the proposed spacing unit, many of whom would like the ability to seek counsel on how they should respond to the application for spacing order. Providing them counsel has been complicated by the fact that meetings of more than 10 people are now strongly discouraged by federal, state and local governments. CAIA has already cancelled one such meeting at which it anticipated well over 10 attendees seeking advice and counsel on this matter.

Because the mineral rights owners within the spacing unit includes numerous homeowners, rather than business interests, they often lack access to legal resources other than via organizations such as CAIA. CAIA has, in past instances, been able to provide valuable information to such individuals via direct visits, canvassing and group meetings. None of those methods is advisable during the current crisis when the President, himself, has urged citizens to avoid contact as much as possible for the next 14 days.

No party would be prejudiced by extending the response deadline. The hearing has already been continued, there is no reason to maintain an arbitrary and unnecessary deadline that will only serve to inhibit the exercise of informed judgment by mineral rights owners.

For all these reasons, CAIA moves to continue the March 26, 2020 deadline for responses, objections, and prehearing motions until such time as the Administrator has set a hearing date.

DATED this 20th day of March, 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 20th day of March, 2020.

Idaho Department of Lands	U.S. Mail	<input type="checkbox"/>
Attn: Mick Thomas	Hand Delivery	<input type="checkbox"/>
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Snake River Oil and Gas	U.S. Mail	<input type="checkbox"/>
c/o Michael Christian	Hand Delivery	<input type="checkbox"/>
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/s/ James M. Piotrowski
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