

**From:** [s. brock](#)  
**To:** [Kourtney Romine](#); [Mick Thomas](#)  
**Subject:** Regarding Docket No. CC-2020-OGR-01-003 – Integration Order CC-2016-OGR-01-001 and Barlow #2-14  
**Date:** Sunday, March 07, 2021 08:05:29 PM  
**Attachments:** [my letter to IDL re contested integration final draft.doc](#)

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Kourtney,

Please accept the attached letter regarding Docket No. CC-2020-OGR-01-003 – Integration Order CC-2016-OGR-01-001 and Barlow #2-14 into the public record.

Thank you.  
Shelley

Shelley Brock  
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Idaho Department of Lands

March 7, 2021

**Regarding Docket No. CC-2020-OGR-01-003 – Integration Order CC-2016-OGR-01-001 and Barlow #2-14**

Mr. Thomas,

I respectfully request that you mandate a new integration order as a prerequisite to the drilling of the Barlow 2-14 well in Payette County.

As a decades-long Eagle resident and chairman of the Idaho citizens advocacy non-profit Citizens Allied for Integrity and Accountability (CAIA), I am deeply concerned with the inherent risks of oil and gas development in residential areas, including thousands of acres already targeted and leased for future drilling throughout Ada County. As we all know, what happens in Payette County will influence oil and gas development across the state, which is why a number of citizens from outside Payette County have voiced their opinions on this and other issues in front of the commission.

That said, the vast majority of folks who have written letters and testified in opposition to the drilling of the Barlow 2-14 well under the existing 2016 integration order were either born and raised in Payette County or have lived there for decades. I would venture a guess that these dozens of objectors representing hundreds of family members are far more personally invested in protecting the health and safety of their families, their property rights, the value of their largest lifetime investment (their homes), their precious, irreplaceable water sources, public lands and rivers, and the tax base of their community and state than a for-profit extraction company based in Arkansas.

Citizens have been justifiably critical of our former operator here, a company which worked in public partnership with Snake River Oil and Gas for years until a spate of lawsuits across multiple states - including right here in Payette County – contributed to their bankruptcy. Court records show that while 13,770 claims were filed against the former operator and their affiliates during bankruptcy proceedings, only 658 of those claims were awarded any money. The vast majority of claims denied were filed by property and royalty owners. History shows that when things go wrong with this industry the citizens and taxpayers most often shoulder the heaviest costs.

In light of this reality I urge you to demonstrate a balanced approach to resource extraction by protecting the rights of Payette County homeowners who have been exposed to these risks against their will, with inadequate compensation and protections under the law. A new integration order for the Barlow section would go a long way toward giving these citizens a voice in the process and ensuring that the terms are just and reasonable for not only the operator and voluntary lessors, but for all those compulsory pooled property owners who deserve to have their concerns fairly addressed before this project moves forward.

Thank you for your thoughtful attention to this matter.

Regards,



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