



City of Fruitland

Area Code 208
Phone 452-4421
FAX 452-6146
www.fruitland.org

200 S. Whitley

P.O. Box 324
FRUITLAND, IDAHO 83619

Idaho Department of Lands

James Thum, Program Manager, Oil and Gas,

Leslie M. Hayes,

RE: Application by Snake River Oil & Gas LLC to establish spacing unit in NE $\frac{1}{4}$ of Section 9 and the NW $\frac{1}{4}$ of Section 10, Township 8 North, Range 5 West, Boise Meridian, Payette County, Idaho. AGCY. CASE No. :CC-2024-OGR-01-001, OAH Case No. 24-320-01

I am writing to provide comments on behalf of the City of Fruitland for the upcoming hearing on June 13, 2024. The City of Fruitland is opposed to the department of lands establishing the above referenced spacing unit primarily because of its inclusion of the city's one and only wastewater treatment facility and surrounding infrastructure. The city invested approximately 18 million dollars in this critical infrastructure and there is concern that location of a gas/oil well nearby could potentially interfere with that infrastructure. The City's wastewater facility consists of a headworks building, two 1 million gallon concrete oxidation ditches, two large concrete clarifiers, a multitude of underground piping and other associated infrastructure. If directional drilling takes place under these critical pieces of equipment, there is always a possibility that damage could result.

The city feels that current regulations do not provide anywhere near appropriate liability insurance amounts to cover such potential damage, in addition to the fact that if the wastewater facility were to be damaged, we have no redundant facilities to treat the entire city's residential, commercial and industrial wastewater.

The City of Fruitland feels strongly that the Department of Lands should take this into consideration when making decisions about oil and gas drilling taking place near municipal infrastructure. If this spacing unit is established, the city would be very

concerned about the proximity of the well pad location in relation to our wastewater facility. The City of Fruitland is also adamantly opposed to any surface use of city property should the spacing unit be established, and is prepared to seek legal remedies should this become an issue.

We respectfully ask the Department of Lands to take our concerns into consideration and do what is necessary to protect the citizens of Fruitland and the city's critical infrastructure.

Thank you for the opportunity to provide comments.

A handwritten signature in black ink, appearing to read "Stuart Grimes", with a stylized flourish at the end.

Stuart Grimes, City Administrator

City of Fruitland