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BEFORE THE IDAHO DEPARTMENT OF LANDS

In the matter of the Application of Snake )	
River Oil and Gas, LLC for an Order )	Agency Case No. CC-2024-OGR-01-001
Establishing a Spacing Unit Consisting of )	
the NE ¼ of Section 9 and the NW¼ of )	OAH Case No. 24-320-0G-01
Section 10, Township 8 North, Range 5 )	OBJECTION TO SPACING
West, Payette County, Idaho )	APPLICATION
)	
)	

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COME NOW Citizens Allied for Integrity and Accountability (CAIA), and Karen Oltman, by and through counsel and hereby give notice of their objections to the Spacing Application in this case. CAIA is a non-profit, membership-based association whose members seek to ensure that industry and government protect and respect the rights of property owners and the natural resources on which Idahoans rely. Karen Oltman is an effected landowner with mineral interests.

An application for a spacing unit is a first step towards integration of personal and real property rights of effected, non-leasing owners. The failure to provide notice of this application to all effected owners violates due process of law requirements set out in the U.S. and Idaho constitutions. The proposed spacing unit is inappropriate for both statutory and practical reasons.

The proposed spacing unit is smaller than is necessary and thus would result in the construction of more wells than is necessary and appropriate. The proposed spacing unit is smaller than the statutory default spacing unit. The proposed spacing unit manages to be both under-inclusive and over-inclusive, thus excluding some mineral owners whose mineral interests will simply be taken by any eventual well operator, while including other owners who have no demonstrable mineral interest. The proposed spacing unit is not an appropriate unit for siting a well, and approval would violate the rights of effected mineral rights owners.

Dated this 23<sup>rd</sup> day of May, 2024.

PIOTROWSKI DURAND, PLLC

          /s/          James M. Piotrowski            
James M. Piotrowski  
Attorneys for CAIA and Karen Oltman

**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 electronic mail, this 23<sup>rd</sup> day of May, 2024.

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/s/ James M. Piotrowski  
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