

James Piotrowski, ISB # 5911
Marty Durand, ISB # 5111
PIOTROWSKI DURAND, PLLC
P.O. Box 2864
Boise, ID 83701
Telephone: (208) 331-9200
Facsimile: (208) 331-9201
james@idunionlaw.com
marty@idunionlaw.com

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-2025-OGR-01-005
Integrating Uncommitted Owners in a	)	
Spacing Unit Consisting of the SE ¼ of	)	
Section 15, the E ½ of the SW ¼ of	)	OBJECTION TO APPLICATION
Section 15, and the NE ¼ of Section 22,	)	and ENTRY OF APPEARANCE
Township 8 North, Range 5 West,	)	
Payette County, Idaho	)	
_____	)	

COME NOW Citizens Allied for Integrity and Accountability (CAIA), Julie Fugate, Darleen Walker, Sharon Harmon, Doris Craig, Larry Morris, Charlene Gomez, and John Sandquist, by and through counsel and hereby give notice of their objections to the Integration 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. Julie Fugate, Darleen Walker, Sharon Harmon, Doris Craig, Larry Morris, Charlene Gomez and John Sandquist are effected landowners with mineral interests within the Spacing Unit.

The law firm of Piotrowski Durand, PLLC, hereby enters its appearance on behalf of the objectors.

The proposed integration would violate the Constitutional Rights of the effected, uncommitted owners, as well as violating Idaho laws on real property ownership, and the state and federal due process rights of said owners. The terms of integration are inconsistent with well-established law, would result in an unlawful trespass by the Applicant, as well as a taking in violation of the U.S. and Idaho Constitutions. The proposed methods of operation and compelled lease terms would put members of the public, the public interest of residents and citizens of Idaho, and the interests of public bodies including county and municipal authorities at risk. The risks include and arise from improper sighting, inadequate protections for the right to quiet enjoyment of property, and result in a denigration of title all in violation of law.

Dated this 30th day of October, 2025.

PIOTROWSKI DURAND, PLLC

/s/ James M. Piotrowski
James M. Piotrowski
Attorneys for Objectors

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 30th day of October, 2025.

Idaho Department of Lands
300 N. 6th Street, Suite 103
PO Box 83720
Boise, ID 83720
schollett@idl.idaho.gov;
kromine@idl.idaho.gov

Snake River Oil and Gas
c/o Michael Christian
Hardee, Pinol & Kracke, PLLC
1487 S. David Lane Suite 930
Boise, ID 83705
mike@hpk.law

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

/s/ James M. Piotrowski
James M. Piotrowski