

**From:** [Martin Marzinelli](#)  
**To:** [Kourtney Romine](#)  
**Subject:** Comments related to "application for spacing"  
**Date:** Thursday, June 11, 2020 04:21:07 PM  
**Attachments:** [IDL Comments 6-11-20.pdf](#)

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Greetings,

I am supplying the following comments on docket CC-2020-OGR-01-001.

Thank you,

Martin Marzinelli

To: Idaho Department of Lands (IDL)

Subject: Application for Spacing, Docket No. CC-2020-OGR-01-00

Date: June 11, 2020

Greetings:

I am opposed to the “spacing” application requested by Snake River Oil and Gas (SROG) company for the following reasons.

- In general, oil and gas companies have a soiled record when it comes preserving or maintaining the environment (water/air quality) and being responsible for problems they cause or own as it relates to polluting nearby lands and water sources. It is highly unlikely SROG will be better than other companies at this.
- There is a long history of extraction industries taking the profits while they can and leaving the extraction sites damaged and then going bankrupt. How would IDL handle this scenario if it occurs with SROG?
- Idaho’s energy future will be far more successful if the state follows the clean energy path that relies on wind, solar, and other related technologies. New investment into fossil fuels is a step to prop up an energy future that is limited, expensive, highly polluting, and controversial.
- Compared to other areas of the country, Idaho has paltry hydrocarbon reserves. The state and the local communities do not need to play financial and environmental roulette should there be pollution problems from this proposed project.
- SROG plans to start using two wells on the banks of the Payette River. In addition, they have constructed and will use a pipeline to transport hydrocarbon products from these wells. The pipeline crosses under the Payette River. Leakage from the wells or pipeline could cause significant contamination of the river, groundwater aquifer, and many local properties that rely on that water. Also, the town of Fruitland depends on clean water from this area. If this tragedy occurs, who is going to pay for the clean-up and compensate losses to local businesses and property owners?
- Recent large earthquakes in this area raise the concern for well and pipeline leaks even higher.
- The proposed project will yield very limited financial benefit either to local property owners or the state. Oil prices are currently at very low values. Is the mirage of financial benefit really worth the risks to pollution and damaged property values?
- An application for “spacing” is the beginning step toward “forced pooling”. This would allow SROG to drill and inject hazardous chemicals under private property and homes without the owners’ permission. Is this ethical?
- Previously, in 2018, a judge determined that forced pooling plans by Alta Mesa oil company violated the constitutional rights of local property owners. Forced pooling by SROG will likewise violate the rights of local property owners. Should the IDL enable a private

company to abuse the rights of local property owners and force them into time-consuming and expensive legal action to once again prove what should be obvious?

I am opposed to the application. I do not think the IDL should allow companies to disregard the health and safety of Idaho's citizens; risk significant pollution to the Payette River, nearby aquifers, and the local air; and disregard citizens constitutional and property rights. Therefore, I ask that IDL deny the proposed application.

Sincerely,

Martin Marzinelli

Eagle, ID