

BEFORE THE IDAHO DEPARTMENT OF LANDS

In the Matter of the Application of Snake River Oil)
and Gas, LLC for Spacing Order Consisting of the)
E ½ of the SE ¼ of Section 9, the SW ¼ of Section)
10, N ½ of the N ½ of the NW ¼ of Section 15,)
and the N ½ of the NE ¼ of the NE ¼ of Section)
16, Township 8 North, Range 5 West, Boise)
Meridian, Payette County, Idaho.)
Snake River Oil and Gas, LLC, Applicant.)

Docket No. CC-2020-OGR-01-001

**CONTINUANCE AND NOTICE OF
CONTINUED HEARING**

Snake River Oil and Gas, LLC (“Snake River”) filed an application on February 24, 2020, requesting a spacing order for a proposed 300 acre unit consisting of the E ½ of the SE ¼ of Section 9, SW ¼ of Section 10, the N ½ of the N ½ of the NW ¼ of Section 15, and the N ½ of the NE ¼ of the NE ¼ of Section 16, Township 8 North, Range 5 West, Boise Meridian, Payette County, Idaho (hereinafter “proposed spacing unit”). That area was previously the subject of two spacing matters, Docket No. CC-2016-OGR-01-004¹ and Docket No. CC-2019-OGR-01-002.²

The Minerals, Public Trust, Oil & Gas Division Administrator, Richard “Mick” Thomas, (“Administrator”) of the Idaho Department of Lands (“IDL”) subsequently issued a March 9, 2020 *Notice of Hearing & Notice of Prehearing Conference* that scheduled an evidentiary hearing for April 9, 2020, at 9:00am (MST) at the Fruitland City Hall, 200 S. Whitley Dr., Fruitland, Idaho and a prehearing conference for April 2, 2020, at the same location.

¹ Docket No. CC-2016-OGR-01-004 was a 2016 application for a 620 acre spacing unit. *See* Finding of Fact 1. That application was granted as a temporary unit until it was vacated in April 2019.

² Docket No. CC-2019-OGR-01-002 was a 2019 application for a 160 acre spacing unit. *See* Finding of Fact 1. That application was dismissed on April 21, 2020.

The Administrator next issued a March 18, 2020 *Order to Vacate and Continue Hearing*, pursuant to Idaho Code § 47-328(3)(d) and due to the COVID-19 emergency. That order vacated and continued the April 9, 2020 evidentiary hearing and the April 2, 2020 prehearing conference. In a subsequent order, the Administrator also continued the March 26, 2020 deadline for objections, responses, and prehearing motions. The Administrator provided that within sixty (60) days he would issue a notice with a new prehearing and hearing date and new deadlines.

On May 14, 2020, the Administrator issued a *Notice of Prehearing Conference, Order Setting Deadline for Objection, Response, and Prehearing Motions* (“*Notice of Prehearing Conference*”). Due to the COVID-19 emergency and the rapidly changing associated guidelines, the Administrator did not schedule a hearing date. He instead set objection, response, and prehearing motion deadlines for June 11, 2020, followed by a July 1, 2020 prehearing conference to discuss scheduling the hearing and possible procedures.

Uncommitted mineral interest owners within the proposed unit filed objections and responses, along with other mineral interest owners noticed within the 620 acre unit area previously proposed in Docket No. CC-2016-OGR-01-004. The objections and responses IDL received from those who owned mineral interests either within the proposed unit or the larger 620 acre area were:

- The McPheeters Family Trust, 2692 Bayberry Dr., Fruitland, ID
- Robbie and Bonnie McGehee, 1465 Ponderosa St, Fruitland, ID
- Ernie and Loretta Neuberger, 2691 Bayberry Dr, Fruitland, ID
- Tim & Kate Kilbourne, 1428 Cottonwood Dr., Fruitland, ID
- Colonel Wendall and Norma Nierman, 1203 Cottonwood Drive, Fruitland, ID
- Clint & Susan Traw, 2716 Dogwood Ave, Fruitland, ID
- Geraldine Davis, 8407 Washoe Rd, Fruitland, ID
- Joyce McCurdy 2742 Birch Rd, Fruitland, ID
- Philip and Kathleen Hendrickson, 1208 Cottonwood Dr Fruitland, ID
- William and Roxie Tolbert, 1210 Cottonwood Dr. Fruitland ID
- Alan & Glenda Grace, 1755 Killebrew Dr. Payette, ID
- Edward Adair, 2900 Birch Rd. Fruitland, ID

- Javier and Leticia Arciga, 2745 Cedar Drive Fruitland, ID
- Cheryl Smith, 2605 Rome Ave. Fruitland, ID
- Diane Johnson, 2737 Spruce Dr. Fruitland, ID
- Dale K. Verhaeghe Linda S. Démoncoult, 1303 Cottonwood Drive Fruitland, ID
- Gary Owen, 1488 Poplar, Fruitland ID
- James and Patricia Dille, 2635 Dogwood Ave, Fruitland, ID
- Larry Butler, 1301 Cottonwood Dr. Fruitland, ID
- Gale M and Beverly A. Gehret, 1415 Cottonwood Dr Fruitland, ID
- Henshaw, 2694 Bayberry Dr. Fruitland, ID
- Dana and Malcolm Harris, 8301 Washoe Road Fruitland, ID
- Miguel Herrera/Francis Florez, 1207 NW 24th St. Fruitland, ID
- Cory Anne and Jacob Fortin, 2684 Bayberry Dr. Fruitland, ID
- Karen Vail, 2822 Spruce Drive, Fruitland ID
- Beverly and James Smith, 8616 Shannon Rd. Payette ID
- Adam & Holly Fugate, 2725 Dogwood Ave. Fruitland, ID
- Timothy Lefebvre, 8700 Shannon Rd. Payette, ID

James Piotrowski filed an objection on behalf of Judith and Jimmie Hicks, Karen Oltman, Allen and Glenda Grace, Shady River, LLC, Carrie Grant, Shannon Benedict, Donald and Phyllis Gruell, Sharon Simmons, Lowell and Geraldine Davis, James and Beverly Smith, Dana Harris, Sandra Dunlap, and Citizens Allied for Integrity and Accountability (“CAIA”). The City of Fruitland, also an uncommitted mineral interest owner in the proposed unit, filed a notice of appearance in the matter. In addition, the Administrator received many written comments from members of the public. No motions to intervene were filed or granted in this matter.

On July 1, 2020, pursuant to the May 14, 2020 *Notice of Prehearing Conference*, a telephonic prehearing conference was held, as provided for in IDAPA 04.11.01.510. The following individuals participated: Michael Christian, attorney for Snake River; James Piotrowski, attorney for certain objectors and CAIA; David Eastman, employee for Woodgrain Millwork, Inc. (“Woodgrain”), representing Woodgrain and Kelly Dame; Stephanie Bonnie, attorney for City of Fruitland; Deputy Attorney General Joy Vega, attorney for IDL; and James Thum, Minerals Program Specialist for IDL. No additional uncommitted mineral interest owners appeared or made their attendance known by telephone at the prehearing conference.

The Administrator subsequently entered a *Prehearing Order and Notice of Hearing* on July 21, 2020, which set a hearing for August 13, 2020 at 9:00 am, via Zoom. The *Prehearing Order and Notice of Hearing* provided that at the spacing evidentiary hearing, the Administrator would not consider evidence related to integration or “just and reasonable” terms and conditions of an integration order provided in Idaho Code § 47-320.³

The Administrator held the hearing via Zoom on August 13, 2020 at 9:00 am. Michael Christian represented Snake River at hearing, and Mr. James Allen provided testimony. James Piotrowski, attorney for Judith and Jimmie Hicks, Karen Oltman, Allen and Glenda Grace, Shady River, LLC, Carrie Grant, Shannon Benedict, Donald and Phyllis Gruell, Sharon Simmons, Lowell and Geraldine Davis, James and Beverly Smith, Dana Harris, and CAIA.⁴ Stephanie Bonnie, represented the City of Fruitland at the hearing. Deputy Attorney General Joy Vega represented IDL, and James Thum provided testimony. No other uncommitted mineral interest owners appeared at the 9:00 am evidentiary hearing.

The parties participating in the hearing were given the opportunity to present testimony and evidence, as well as opening and closing statements, cross examine witnesses, offer rebuttal testimony. The Administrator also asked questions of witnesses and attorneys. Snake River presented Exhibits SR 1-11. IDL presented Idaho Department of Lands Amended Exhibit 1. No objections to those exhibits were received and they were admitted into record.

Additionally, interested persons had the opportunity to present public testimony as public witnesses at a separate evening session of the hearing on August 13, 2020 at 6:00 pm, pursuant to

³ The Administrator reiterated this again at the beginning of the evidentiary hearing and public testimony session. Rec. 4:50.

⁴ Mr. Piotrowski also filed an objection on behalf of Sandra Dunlap, who was identified in the objection as holding a surface estate “within the identified area.” However, Mr. Piotrowski did not identify himself as appearing on behalf of Ms. Dunlap at hearing.

Idaho Code § 67-5242(3)(c) and IDAPA 04.11.01.355.⁵ At the opening of that evening session, the Administrator stated that he would also accept additional written public comments received on or before 5:00 pm on August 14, 2020 to ensure that all public witnesses had an opportunity to watch the hearing before filing comments.⁶ The public witnesses that testified at this session were: Linda Dernoncourt, Roxie Tolbert, Susan Havlina, Shelley Brock on behalf of CAIA, Joey Ishida, Dana Gross, Sharon Simmons, Julie Fugate, and Sue Bixby. Several additional written comments were received before the August 14 deadline. Comments filed after 5:00 pm on August 14, 2020 were not considered in this decision.

FINDINGS OF FACT

1. Two previous administrative proceedings have addressed lands included in the proposed spacing unit. One matter was Docket No. CC-2016-OGR-01-004, which was a 2016 application by operator Alta Mesa Services, LP and AM Idaho, LLC (collectively “Alta Mesa”) for a 620 acre spacing unit consisting of the SE ¼ of Section 9, the SW ¼ of Section 10, the NW ¼ of Section 15, and the NE ¼ of Section 16, Township 8 North, Range 5 West, Boise Meridian, Payette County, Idaho. The second matter was Docket No. CC-2019-OGR-01-002, operator AM Idaho, LLC’s 2019 application for a 160 acre spacing unit consisting of the SW ¼ of Section 10, Township 8 North, Range 5 West, Boise Meridian, Payette County, Idaho. The Administrator took official notice of all documents filed in Docket No. CC-2016-OGR-01-004 and Docket No. CC-2019-OGR-01-002.

⁵ Public witness testimony was held via Zoom videoconference with an in-person testimony option also available in Fruitland. The *Notice of Hearing* noted that comments via Zoom and in-person comments will be given the same weight and consideration regardless of the method used to testify.

⁶ The August 13, 2020 Zoom hearing was live-streamed on Facebook-live. Due to technical difficulties, the hearing began late and was interrupted at several points. IDL recorded the entire hearing and it was posted on the website by the morning of August 14.

2. In Docket No. CC-2016-OGR-01-004, the IDL Director issued a January 23, 2017 order that established a 620 acre temporary spacing unit consisting of the SE ¼ of Section 9, the SW ¼ of Section 10, the NW ¼ of Section 15, and the NE ¼ of Section 16, Township 8 North, Range 5 West, Boise Meridian, Payette County, Idaho. That order was affirmed by the Commission in a March 7, 2017 Final Order.
3. In April 2018, Alta Mesa filed a petition to amend the Docket No. CC-2016-OGR-01-004 spacing and integration order, requesting an 18 month extension. The Administrator granted the petition with certain modifications on July 16, 2018.
4. In 2019, the Commission vacated these 2017 and 2018 orders and remanded the case to the Administrator for future proceedings based on the United States District Court for the District of Idaho's Memorandum Decisions and Orders issued in *CAIA v. Schultz*.⁷ Alta Mesa later withdrew its application in Docket No. CC-2016-OGR-01-004, the matter was vacated. From that date forward, no spacing order existed for that 620 acre area.
5. In June 2019, AM Idaho, LLC filed an application for spacing and integration in Docket No. CC-2019-OGR-001-002. AM Idaho requested a 160 acre spacing unit instead of Docket No. CC-2016-OGR-01-004's 620 acre unit. The Administrator bifurcated the spacing and integration proceedings and scheduled a spacing evidentiary hearing. However, AM Idaho, LLC filed for Chapter 7 bankruptcy and did not attend the prehearing conference. After AM Idaho failed to respond to a show cause order, the Administrator dismissed Docket No. CC-2019-OGR-001-002.⁸

⁷ Case 1:17-cv-00264-BLW Memorandum Decision and Order. Citizens Allied for Integrity and Accountability, Inc., et al., v. Thomas M. Schultz, et al.,

⁸A map of these previous and proposed spacing units is found in IDL Exhibit 1, which shows the Harmon Field in the Payette area with existing spacing units, previous proposed spacing units, and currently proposed spacing units. Ex 1, IDL 002.

6. Snake River filed its application for the proposed spacing unit in the above-captioned matter on February 24, 2020. *IDL 2/24/20 e-mail confirmation*. Snake River's application included a Declaration of its geophysicist consultant Dr. James Allen, who had previously mapped Idaho seismic data. *Allen Declaration*, p. 1. On February 28, 2020, Snake River filed a supplemental Declaration of James Allen.
7. On March 2, 2020, pursuant to Idaho Code § 47-328(3)(a), IDL requested additional information to clarify parts of Snake River's application. *IDL 3/2/20 Letter*. The items requested included additional well log information. Additionally, it requested that the applicant Snake River be prepared to present ten additional items at hearing, including structure maps in subsea (SS) depth, pressure test results, porosity and permeability of net pay, thickness of net pay, water saturation of net pay, reservoir temperature, gas analysis and gas oil ratio, gas formation volume factor, estimated original gas in place and expected recovery, and reservoir drive mechanism. Before the hearing, the Department received all the information it requested from Snake River. Rec. 17:50
8. On March 2, 2020, Snake River mailed a copy of the February 24, 2020 application and Dr. Allen's February 28, 2020 Supplemental Declaration by certified mail to all uncommitted mineral interest owners within the proposed spacing unit. *Proof of Mailing 3/4/20*. Snake River also mailed the application by regular mail to all uncommitted owners within the previously established and now expired spacing unit in Docket No. CC-2016-OGR-01-004. *Id.*
9. The target reservoir sections were fluvial and lacustrine sands in the Poison Creek and Chalk Hills formation of the Idaho group. *Allen Declaration* ¶4.
10. On October 19, 2017, the Department approved an application for permit to drill the Fallon #1-10, a well located on the temporary spacing unit in Docket No. CC-2016-OGR-01-004.

11. In February 2018, the Fallon #1-10 was directionally drilled to 5432' Measured Depth⁹ (MD) and 4995' True Vertical Depth (TVD). The operator at the time, AM Idaho, LLC, ran open hole logs on drill pipe and set and cemented production casing. *Allen Declaration* ¶7.
12. The petrophysical logs ran for the Fallon # 1-10 included Spectral Gamma Ray, Induction, Neutron/Density Porosity, and Dipole Sonic Logs. *Allen Declaration* ¶8.
13. The Fallon #1-10 encountered Sand B from 3772'-3880'MD (3453'-3545' TVD) with approximately 92' of gross gas pay and 70' of net pay. *Allen Declaration* ¶9; Ex. 4. The depth of Sand B was approximately 80' structurally lower than predrill expectations. *Allen Declaration* ¶12, 13.
14. In March 2018, Sand B was perforated at 3815'-3835' MD. *Allen Declaration* ¶10. Sand B is a structural/stratigraphic trap. *Allen Declaration* ¶11. The Fallon #1-10 tested and confirmed a known natural gas and condensate reservoir. *Application* p. 3 *Allen Declaration* ¶11, 19.
15. Dr. Allen testified that in his opinion the well in this unit would produce with a water drive based on other nearby wells, including the Kauffman #1-34 and M-L Investments #2-10 Lower Target. *Allen Declaration* ¶13; Rec. 46:00. He testified that the Kauffman #1-14 demonstrated water drive as it has gas on top of a large body of water, similar to exists in the Fallon #1-10 well. *Id.* The volume of the reservoir tank may be comparable to the reservoir tank associated with the Kauffman #1-34 well. *Allen Supp. Declaration* ¶4
16. After Snake River reaches the economic limit of the current perforations, it plans to plug back the well and perforate near the top of the sand at 3772'MD, 3453' TVD, 1289' ("SS"). *Allen*

⁹ Measured Depth (MD) is the depth measured from top of the well, along the well bore. The MD is not the vertical depth in this case because the well was drilled directionally. 29:50.

Declaration ¶17. Dr. Allen testified that such a depth would be the structural top of the ultimate producible drainage area in a water driver reservoir. *Id.*

17. In his testimony at hearing, Dr. Allen identified the geologic evidence Snake River relied on in proposing the unit. He stated that in determining the possible limits of the reservoir, he looked at all of the geologic evidence and information from the well itself, including well logs, amount of pay, pressure, porosity, permeability, configuration of the reservoir, pressure data, and the presence of water support, and he then tied that information to the seismic data. Rec. 17:20; 20:40.

Dr. Allen testified about Exhibit SR 1 (“SR 1”), a Depth Structure Map for Fallon B Sand, to demonstrate his conclusions about the limits of the reservoir.¹⁰ Rec. 23:30. He explained that the map showed the gas-water contact to the northwest of the well bore at 1381 feet SS, which determines the northwest limits of the pool.¹¹ He further explained that the gas-water contact line identifies the level at which the hydrocarbons lie on top of water and that there would be no hydrocarbons deeper than that point. Rec. 23:00. He testified that the gas-water contact can also be seen in the well log and in the seismic data. Dr. Allen testified that the formation is thickest from the northwest to the southeast and that the southwest boundary of the formation is likely a pinchout somewhere below the gas water contact because Sand B is not found in the Orida well. Rec. 40:34. Dr. Allen testified that there was a limit to the southeast of what Snake River thought the well would produce. Rec. 30:30. That limit was where the base of Sand B intersects the highest

¹⁰ The difference between a Depth Structure Map (SR 1) and an Isopach map (SR 3) is that the structure map is the depth to the top of the sand at any point they can measure it. Rec. 37:50. Isopach means “thickness” and contours on isopach maps are the contours showing the thickness of the sand at any given point.

¹¹ He believed the probability of the contact being where he stated was “well over 90%” with plus or minus 5 feet. Rec. 1:30.

point perforations could be located. Dr. Allen stated that as you go up dip to the southeast the SS depth of the base of the Sand B intersected the highest point along the well bore that could be perforated. As you move to the northwest it thins and as you move to the southeast it thins.” Rec: 19:40. Dr. Allen infers this with Exhibit B in his Supplemental Declaration provided on February 28, 2020.

18. Dr. Allen also referred to Exhibit SR-5, a neutron density log for the Fallon #1-10, which he believed showed the top of the productive Sand at 1289’ SS. He testified that it also demonstrated the limit of the reservoir, which was the gas-water contact line. Below the line would be water and above the line would be productive Sand. 33:00; 34:50. He also stated that the gross overall interval for Sand B is with a true vertical thickness of 141 feet. Rec. 34:30.

19. The pool is interspersed with clay-stones and shales that include non-productive zones. Rec. 36:30.¹² Snake River’s current perforations are located in the center of Sand B’s productive zone. Even with additional perforations that are higher up the well bore the Fallon #1-10 well bore cannot produce above 1289’ SS. Rec. 31:45.

20. Dr. Allen testified that SR-2, an Isopach Map for Sand B, demonstrated the thickness of the proposed sand throughout the proposed unit. Rec: 39:00. It was not the thicknesses of what Snake River believes will be produced. Rec. 41:45. It shows Sand B thinning to the northeast, identified on SR-2 as the “pinch-out” of Sand B.

21. Dr. Allen used seismic data and tied it to well data from the Fallon #1-10 and the May #1-13. Rec. 43:00. Ex. SR-7. Dr. Allen testified that data shows that Sand B continues at least 2.4 miles to the northwest, which provides a water cushion that the gas sits on. Rec. 45:30.

¹² Net pay is calculated by taking out these small unproductive areas from the final calculations. 36:45.

22. SR-3 is a net pay isopach map for Sand B created by Dr. Allen. Rec: 50:00. He stated that this map showed the reservoir that can be produced. Rec. 52:00.
23. Dr. Allen noted that Snake River only had information about the porosity of the well and estimated the permeability on the exhibit based on other wells in Willow Field, including the ML Investments #2-10. He testified that these are highly porous rocks and the porosity or permeability would not impose a constraint on the drainage of the well; rather, his opinion was that the porosity and permeability in this well was excellent. Rec. 55:00.¹¹
24. Dr. Allen explained three additional exhibits. SR-8 was an analysis of the gas samples tested from the Fallon #1-10, which showed that (1) the gas from the well was almost completely hydrocarbons and (2) the BTUs were over 1200. Rec. 58:00. SR-10 contained the results from a condensate sample (which is the liquid portion of the reservoir). (Rec: 1:00). Based on these exhibits, the Administrator finds the well is primarily a gas well.
25. Dr. Allen testified that he believed that the well will produce at the rate 3.84 MMCF/day and condensate at about 100 bbl./day. Rec. 1:04. SR-11.
26. Dr. Allen testified that his opinion was that the proposed spacing unit would result in the efficient and economical development of the pool as a whole. Also, his opinion was that the proposed spacing unit is not smaller than the maximum area that can be efficiently and economically drained by one well. Rec. 1:20¹⁴; *Allen Declaration* ¶ 18.
27. Upon questioning from Mr. Piotrowski, Dr. Allen testified that the Fallon #1-10's producible zones are below the top of sand B and a well drilled higher in Sand B could produce more of

¹³ Exhibit SR-4 demonstrated the porosity and permeability of Sand B. Porosity is the holes in the rock, or the space in the rock where liquids or hydrocarbons exist. Permeability is the connections between to holes, which is where liquids or hydrocarbons flow through.

¹⁴ The audio/video recording is available for viewing at the IDL YouTube channel

the reservoir. Rec. 1:24. Dr. Allen testified that there can be wells drilled elsewhere in the pool that could drain the pool more efficiently. Rec. 1:27.

28. Mr. Thum independently evaluated the well log information from the Fallon #1-10. Rec. 2:20, IDL Ex. 1, IDL 005. He determined that a wet or transition zone existed and found it was within ten feet of what Snake River had determined. Rec. 2:20.
29. The Fallon #1-10 is the only well that has encountered Sand B. Rec. 2:16
30. Based on updated geologic data, Snake River has requested a change in the boundary of the proposed spacing unit that differs from Docket No. CC-2016-OGR-01-004's previous spacing unit. Rec. 2:17. IDL Am. Ex. 1, IDL004.
31. Mr. Thum testified that no production can occur above the top of the perforations. The well's top perforation is not the top of Sand B, but instead just the top of the highest possible perforations in the productive zone of the well bore, which would be located at 1289' SS. Rec. 2:28. Snake River will be limited to what is below the perforations for purposes of production. Mr. Thum testified that the proposed unit covers the portion of the pool that can be drained by the Fallon #1-10. Rec. 3:12; IDL Exhibit 1, IDL008
32. With reference to Exhibit SR 3, Net Pay Isopach Map for Fallon B Sand, Mr. Thum stated that the "contours don't represent any depth, they represent a zone within that well that is indicated as possibly productive and these counters indicate the areas that can produce within the Fallon 1-10." Rec. 2:39. He stated that an Isopach map is created by taking the sand map and the structure map and basically subtracting those. The Net Pay Isopach Map is a thickness map.
33. Mr. Thum testified that leaving hydrocarbons in the ground is not necessarily known as waste of hydrocarbons because there are secondary and tertiary recovery methods that allow someone to come back and recover when the economics are there.

34. Mr. Thum testified that his opinion was that the 300 acre unit proposed would be appropriate for the proposed spacing unit. IDL Am. Ex. 1, IDL 012; Rec. 2:32. His opinion was that the northwest boundary of the hydrocarbons was established through the gas-water contact, the geometry of Sand B, and the drilling angle. Rec. 2:30. He believed that regardless of the water-drive's strength, as production occurs water will encroach and limit how much Snake River can produce the well. While this is a small amount of data compared to other fields around the country, his opinion was that there was enough information to support the request. Rec. 2:33. Mr. Thum also requested that this be established as a permanent unit because there is enough geologic data. Rec. 2:35. IDL also requested production data on a three month interval to determine spacing in the Payette Basin going forward. Rec. 2:36.
35. The public witnesses that testified at this session were: Linda Dernoncourt, Roxie Tolbert, Susan Havlina, Shelley Brock on behalf of CAIA, Joey Ishida, Dana Gross, Sharon Simmons, Julie Fugate, and Sue Bixby. The public witnesses testified in opposition to the application and covered many subjects, including the risk of potential environmental harms, potential liability, the changes in the area covered by the spacing application, the proximity of residential areas to oil and gas development, and the concern that a smaller unit will result in more wells.
36. This *Continuance and Notice of Continued Hearing* incorporates by reference the entire record in this matter and accompanying exhibits, comments from mineral owners and public witnesses, correspondence from IDL personnel, notices, pleadings, responses from the uncommitted mineral interest owners within the proposed unit, and the hearing recordings.

CONCLUSIONS OF LAW AND ANALYSIS

A. The Administrator has jurisdiction over this matter.

1. The Administrator is authorized to conduct this hearing pursuant to Idaho Code §§ 47-318 and 47-328. This proceeding is governed by the Idaho Oil and Gas Conservation Act (Chapter 3, title 47, Idaho Code); the Idaho Administrative Procedure Act (Chapter 52, title 67, Idaho Code); Idaho Rules of Administrative Procedure of the Attorney General (IDAPA 04.11.01), to the extent that the Rules of Administrative Procedure are not superseded by Oil and Gas Conservation Act; and the Rules Governing Conservation of Oil and Natural Gas in the State of Idaho (IDAPA 20.07.02).
2. The Idaho Oil and Gas Conservation Act applies to all matters affecting oil and gas development on all lands located in the state of Idaho. Idaho Code § 47-313.
3. The Idaho Oil and Gas Conservation Commission (“Commission”) is “authorized to make and enforce rules, regulations, and orders reasonably necessary to prevent waste, protect correlative rights, to govern the practice and procedure before the commission, and otherwise to administer [the Act].” Idaho Code § 47-315(8). IDL is the administrative instrumentality of the Commission and the Oil and Gas Administrator has authority over these proceedings pursuant to Idaho Code §§ 47-314(7), 47-318, and 47-328(3).

B. Snake River bears the burden of proof

1. The Applicant generally bears the burden of proof in this matter. “The customary common law rule that the moving party has the burden of proof – including not only the burden of going forward but also the burden of persuasion – is generally observed in administrative hearings.” *Intermountain Health Care, Inc. v. Bd. of County Comm’rs of Blaine County*, 107 Idaho 248, 251, 688 P.2d 260, 263 (Ct. App. 1984) *rev’d on other grounds* 109 Idaho 299, 707 P.2d 410 (1985).
2. Under Idaho law, “preponderance of the evidence” is generally the applicable standard for administrative proceedings, unless the Idaho Supreme Court or legislature has said otherwise. *N. Frontiers, Inc. v. State ex rel. Cade*, 129 Idaho 437, 439, 926 P.2d 213, 215 (Ct. App. 1996). “A

preponderance of the evidence means that when weighing all of the evidence in the record, the evidence on which the finder of fact relies is more probably true than not.” *Oxley v. Medicine Rock Specialties, Inc.*, 139 Idaho 476, 481, 80 P.3d 1077, 1082 (2003).

3. A court shall affirm an agency’s action unless the decision is “not supported by substantial evidence on the record as a whole; or [the decision] is arbitrary, capricious, or an abuse of discretion. Idaho Code § 67-5279(3)(d)-(e).

C. CAIA / Parties

1. Mr. Piotrowski identified the CAIA members within the proposed unit as Judith and Jimmie Hicks, Karen Oltman, Allen and Glenda Grace, and Shady River, LLC. Mr. Piotrowski identified the following clients owners as outside of the proposed spacing unit but within a possibly appropriate spacing unit he argues will be drained by this unit as Carrie Grant, Shannon Benedict, Donald and Phyllis Gruell, Sharon Simmons, Lowell and Geraldine Davis, James and Beverly Smith, and Dana Harris. No evidence was submitted in the record to support these assertions.
2. Mr. Piotrowski did not indicate he was appearing on behalf of Sandra Dunlap at hearing. Rec. 9:50.
3. After inquiry at the prehearing conference from the Administrator to Mr. Piotrowski about whether his clients outside the proposed unit intended to intervene, Mr. Piotrowski indicated that those mineral interest owners that were outside of the proposed spacing unit were granted intervention in a similar application in Docket No. CC-2019-OGR-01-002, but he would review the record and may file an intervention on their behalf in this matter. *Prehearing Order and Notice of Hearing* p. 2.

4. The *Prehearing Order and Notice of Hearing* provided: “Any late motions to intervene must be filed in accordance with IDAPA 04.11.01.350-354. Motions to intervene not timely filed must state a substantial reason for delay. IDAPA 04.11.01.352.”
5. Because the owners outside the proposed spacing unit are within an area potentially affected by the proposed unit, the Administrator is, in this particular instance, and without setting precedent, exercising his discretion to allow their participation without a formal motion to intervene, and leaves for future decision the circumstances under which a formal motion to intervene may be required for mineral interest owners outside a proposed spacing unit.

D. Additional evidence is necessary for the Administrator to evaluate the application under Idaho Code § 47-318.

1. A spacing unit order “shall specify the size, shape and location of the units, which shall be such as will, in the opinion of the department, result in the efficient and economical development of the pool as a whole.” Idaho Code § 47-318(2).
2. Idaho Code § 47-318(1) provides: “The department shall promptly establish spacing units for each pool except in those pools that have been developed to such an extent that it would be impracticable or unreasonable to establish spacing units at the existing stage of development.” Thus, when a pool exists, the Legislature has charged the Administrator with prompt development of spacing units.
3. A pool is “an underground reservoir containing a common accumulation of oil and gas. Each zone of a structure that is completely separated from any other zone in the same structure is a pool.” Idaho Code § 47-310(25).
4. In this case, the well logs, testimony from geologists James Allen and James Thum, and additional geologic evidence in the record all indicates that a pool called “Sand B” exists. The

Administrator therefore acknowledges the need to promptly act in accordance with Idaho Code § 47-318(1).

5. However, the Administrator needs additional information to determine whether the Sand B that underlies this 300 acre unit is completely separated from any other zone in the same structure, whether the extent of the pool extends to additional lands, and whether the size, shape, and location of the proposed unit will result in the efficient and economical development of the pool as a whole. For that reason, the Administrator orders a continuance of the evidentiary hearing to receive additional evidence related to these questions.
6. Based on Dr. Allen and Mr. Thum's testimony about the well logs, nearby wells, and other geologic data presented at hearing, the Administrator determines the Sand B pool is a water drive system with a gas-water contact that will limit the boundaries of the pool to the northwest. After reviewing all of the evidence, the Administrator determines that proposed northwest boundary of the pool is the water gas contact point and falls with the proposed unit boundary.
7. However, the Administrator needs additional evidence to determine the limit of the pool to the southeast boundary. The testimony and exhibits presented at hearing presented inconsistencies that the Administrator cannot reconcile with his own calculations. Due to those inconsistencies and remaining questions, the Administrator will take additional evidence on how this proposed boundary was determined and whether the pool goes to the southeast beyond the proposed unit boundary. To assist the parties in understanding the Administrator's calculations, those calculations and the assumptions they are based upon are described in the following paragraphs.
8. Snake River's exhibits show inconsistencies. For example, SR 1 states that the base of Sand B is -1289' SS. SR1 also shows the structural top of Sand B via the overlain isopach map. On SR

1 east of the magenta line, the red dotted line intersects the -1300' SS isopach line. That intersection indicates that the top of Sand B at that point is -1300' SS. Dr. Allen stated that the red dotted line represented -1289' SS. Since -1300' SS is lower than -1289' SS this would indicate the proposed top of the formation is 11' SS lower than the base. That would amount to Sand B being -11' TVD thick at that point. Using this intersection point as a reference, Exhibit SR 2 indicates that thickness of Sand B at that point is 160' TVD. If the -1300' top of Sand B is true, this would put base of Sand B at approximately at -1460' SS. Another example is where the red dotted line intersects the -1250' SS contour on SR-1. There, SR 2 indicates the gross thickness is ~165' TVD. This would put the base of Sand B at approximately -1415' SS. A third example can be seen continuing to the northeast, where the red dotted line in SR 1 intersects the -1250' SS contour line again closer to the eastern boundary of the proposed unit. There the top of Sand B is -1250' SS. If the base of sand B is -1289' SS, that would leave the net pay to be 39' TVD thick. However, SR-2 indicates that the thickness here is approximately 90' TVD. This would put base of Sand B at approximately -1340' SS. These possible calculations indicate the difference between the proposed Fallon B Sand base at -1289' SS at the fine dotted line on SR1 and SR2, and the calculated Fallon B Sand base computed by comparing the structural top of the Fallon B Sand to the thickness of the Fallon B Sand at these points.

9. Additional inconsistencies exist in these exhibits. In SR1 the -1150' SS line indicating the top of Sand B is shown south of the southern unit boundary. SR 2 shows that the thickness of Sand B in this area is approximately 170' TVD. Based on those representations, the base of Sand B would be approximately -1320' SS. Snake River's testimony at hearing indicated that the gas-water contact would allow drainage below -1289' SS. The -1320' SS depth is lower than the -

1289' SS proposed as the highest recovery point of the Fallon 1-10 well. The question remains as to whether this area could be drained by the Fallon 1-10 well given the high porosity and permeability in this sand. Per Snake River and IDL's testimony, the highest point that could be drained by the Fallon 1-10 well bore is -1289' SS which is the estimated top of Sand B along the well bore. If the estimated base of Sand B is correct the calculated base of Sand B that falls below the -1289' SS limit may have the ability to be drained by the Fallon 1-10 well. This would indicate a possible drainage area that extends below southern boundary of the proposed unit. Thus, the Administrator will continue the hearing to take additional evidence of the tops, bottoms, and thickness of Sand B, which could be supported with a larger map of the area with verified depths to top and bottom of Fallon B sand.

10. Additionally, the Administrator will take evidence on the extent of the pool that may be drained when the perforations are placed at -1289' SS. This is important because Dr. Allen confirmed that new perforations for the Fallon 1-10 would likely be created when the gas/water contact reached the top of the current perforations. New perforations above the perforations stated in the application would open up more of the pool for recovery by the Fallon 1-10. This was confirmed by James Thum's testimony. However, the documents and testimony in the record rely on the assumption that once the gas/water boundary is reached by the well, then production will stop. This assumption doesn't follow current industry practices of continuing to drain the pool until the water ratio becomes economical, or the methods used by the previous operator. Based on the practices of the last operator, when the gas/water boundary is reached the produced water is disposed of with residual hydrocarbons separated out. In general, a water drive reservoir produces until the aquifer pressure is depleted or the water production from the well makes economics nonviable. The Administrator will take evidence that elaborates on the

planned well operation once the gas/water boundary is reached. Specifically, will the operator continue production when the hydrocarbon / water contact is reached? How will separation be carried out?

11. The Idaho Oil and Gas Conservation Act provides that “the size of the spacing units shall not be smaller than the maximum area that can be efficiently and economically drained by one (1) well” with limited exceptions. Idaho Code § 47-318(3). If there is not sufficient evidence at the time of hearing “from which to determine the area that can be efficiently and economically drained by one (1) well,” the Administrator can order a temporary spacing unit “for the orderly development of the pool” pending additional information about what the size of the unit should be. Idaho Code § 47-318(2)(a). Here, Snake River does not request a temporary unit and the Department does not recommend a temporary unit. The additional evidence the Administrator will hear at his continued hearing is likely something the operator currently possesses, not something that will only be gained in the future through additional production. Thus, the Administrator orders a continuance instead of a temporary unit.

12. Idaho law requires:

An order establishing spacing units shall direct that no more than one (1) well shall be drilled to and produced from the common source of supply on any unit, and shall specify the location for the drilling of a well thereon, in accordance with a reasonably uniform spacing pattern, with necessary exceptions for wells drilled or drilling at the time of the filing of the application.

Idaho Code § 47-318(4).

13. As to Idaho Code § 47-318(4)’s mandate for one well to the common source of supply, Snake River proposes only one well to the source of supply and the unit is not smaller than the maximum area that could be effectively and economically drained by one well: “Sand B.” *Allen Declaration* ¶18. No evidence was offered into the record that Snake River seeks authorization to drill and produce a different source of supply for this spacing unit. Thus, the

Administrator concludes that Sand B is the common source of supply for this proposed unit and that only one (1) well may be drilled to and produced from Sand B. However, because the Administrator will accept additional evidence related to the extent of the pool, he will not make any additional decisions at this time.

14. Idaho Code § 47-318(5) provides: “An order establishing spacing units for a pool shall cover all lands determined or believed to be underlaid by such pool.” In addition, the department may modify a spacing order “from time to time to include additional lands determined to be underlaid by such pool or to exclude lands determined to not to be underlaid by such pool.” *Id.*
15. Idaho Code § 47-318(5) also recognizes the possibility that a “pool may be divided into zones and a spacing unit for each zone established if necessary to prevent or assist in preventing waste of oil and gas, to avoid drilling unnecessary wells, to protect correlative rights, or to facilitate production through the use of innovative drilling and completion methods.” *Id.* “Spacing units within the zone may differ in size and shape from spacing units in any other zone but may not be smaller than the maximum area that can be efficiently and economically drained by one (1) well.” *Id.*
16. Put simply, Idaho Code § 47-318(5) provides that a spacing order should cover the entire pool and can allow for multiple units. In some circumstances this may be different than field wide spacing because field-wide spacing can be “the general area underlaid by one (1) or more pools.” Idaho Code § 47-318(5) is instead directed at one pool. Depending on any additional evidence and testimony submitted at the Administrator’s continued hearing, it is possible that multiple units could be necessary to cover the entire pool of Sand B. If that is the case, the pool and multiple units simultaneously could be evaluated simultaneously to evaluate whether the spacing order in fact “covers the entire pool” as mandated in Idaho Code § 47-318(5).

ORDER

Based on the reasons stated above, pursuant to Idaho Code § 47-328(3)(d) and IDAPA 04.11.01.561, the hearing is HEREBY CONTINUED for further evidentiary hearing. The evidence and argument at this further evidentiary hearing is restricted to the following:

- (1) Evidence clarifying the top, bottom, and thicknesses of Sand B addressed towards a comprehensive assessment of the pool, which may be supported with reference to the structural bottom map and SS depths.
- (2) Evidence regarding where the -1289' SS perforation would drain in relation to the pool, which could be addressed through a new map specifically addressing that question; and
- (3) Evidence addressing what percentage of hydrocarbons are below the transition line of the water/gas contact.

Further evidence will aid the Administrator in determining whether Sand B is completely separated from any other zone in the same structure, whether the 300 area spacing unit encompasses the maximum area that can be efficiently and economically drilled, or whether additional spacing units for Sand B should also be proposed in accordance with Idaho Code § 47-318(5).

NOTICE OF CONTINUED HEARING

It is hereby ordered that all Counsel for parties that wish to further appear in the above-captioned matter shall participate in a Zoom Hearing on October 6, 2020 at 9:00 AM, Mountain Daylight Time. This is a continued evidentiary hearing and no additional public comment will be taken. The Administrator will hold the hearing via Zoom videoconference. Idaho Department of Lands will e-mail a participation link to those parties who participated in the August 13th hearing. The hearing will be broadcast live via Facebook Live. The link will be posted on the IDL website prior to the hearing. The hearing location meets the accessibility requirements of the Americans with Disabilities Act ("ADA"), in accordance with IDAPA 04.11.01.551. If a person requires assistance of the kind the agency is required to provide under the ADA in order to participate in or understand the hearing, the agency will supply the assistance upon request. Please submit any requests to IDL by 5:00 pm (MDT) on October 1, 2020.

PROCEDURES AND REVIEW

Pursuant to Idaho Code § 47-328(3)(e), the above-captioned order shall not be subject to any motion to reconsider or further review, except for appeal to the Idaho Oil and Gas Conservation Commission. Pursuant to Idaho Code § 47-328(4), this order may be appealed to the Commission by the applicant or any owner who filed an objection or other response to the application within the time required. An appeal must be filed with the Administrator within fourteen (14) calendar days of the date of issuance of the Administrator's written decision. The date of issuance shall be September 17, 2020 which is three (3) calendar days after the Administrator deposits the decision in the U.S. mail. Such appeal shall include the reasons and authority for the appeal and shall identify any facts in the record supporting the appeal. Any person appealing shall serve a copy of the appeal materials on any other person who participated in the

proceedings below, by certified mail, or by personal service. Any person who participated in the proceeding below may file a response to the appeal within five (5) business days of service of a copy of the appeal materials. The appellant shall provide the Administrator with proof of service of the appeal materials on other persons.

If no appeal is filed within the required time, this decision shall become a final order. Idaho Code § 47-328(6).

Dated this 14 day of September, 2020.

A handwritten signature in black ink that reads "Mick Thomas". The signature is written in a cursive, flowing style.

RICHARD "MICK" THOMAS

Minerals, Public Trust, Oil & Gas Division Administrator

Dear party:

You are receiving formal notice of an email exchange between the Department and OGCC Commissioner James Classen per IDAPA 04.11.01.417. We are including this in notice of continuance and notice of hearing in order to reduce the number of mailings sent out.

I became aware of this because I was copied on the e-mail. Department staff participated in the evidentiary hearing. I am the presiding officer for the evidentiary hearing and the commission would be the presiding officer and final decision maker on any appeal. Therefore, consistent with IDAPA 04.11.01.417, I consider this an ex parte communication and I am placing a copy of the communication in the file for the case and distributing to all parties of record.

Regards,

Mick Thomas
Division Administrator
Minerals, Public Trust, Oil & Gas
mthomas@idl.idaho.gov

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Website: <https://ogcc.idaho.gov/>
Website: <https://www.idl.idaho.gov/>

Mick Thomas

From: Mick Thomas
Sent: Friday, August 14, 2020 3:17 PM
To: Jim Classen
Subject: RE: Class II UIC

Commissioner Classen,

Your correspondence with James Thum and myself will be added to the record. Mr. Thum represents the Idaho Department of Lands which is a party in this contested case. I am also the hearing officer in this contested case.

Please refrain from communicating further with Mr. Thum or myself regarding any ongoing contested case.

Regards,

Mick Thomas
Division Administrator
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From: Jim Classen <classenllc@msn.com>
Sent: Friday, August 14, 2020 1:15 PM
To: James Thum <ferrycanyon@gmail.com>
Cc: Mick Thomas <mthomas@idl.idaho.gov>
Subject: Re: Class II UIC

James, I watched the hearing on Utube thanks... I hoped these would be posted quickly. You know that even with a water drive the pressure sink at the wellbore drains some of the up-dip gas. Most reservoirs are somewhat of a combination of pressure depletion and water expansion. There are some wells that performed as pressure depletion reservoirs and others as water expansion. When you asked for all that data in your request letter, I never thought you would get it all. I thought Jim Allen was very patient. I want to review all this stuff and then I will get back to you. I don't see the spreadsheet nor your display. On the test plot, it's too bad they did not plot

FTP and choke size. I don't understand the constant tubing pressure with increasing flow however. Jim

From: James Thum <ferrycanyon@gmail.com>

Sent: Friday, August 14, 2020 10:19 AM

To: Jim Classen <classenllc@msn.com>

Subject: Re: Class II UIC

Agree there are lots of unknowns. I think EPA is more concerned with potential leaking rather than overpressuring, which is just one example of not asking the right questions. They've also not requested any compressibility / fracture data on the top seal which was something we had to submit to all regulatory agencies for gas storage operations at Mist Field. We were normally requesting to delta pressure the reservoir +10% over initial pressure.

You may have seen this already, but SROG provided some very helpful data needed for reserve estimate calculations in the Payette Basin. Here's a direct link:

https://ogcc.idaho.gov/wp-content/uploads/sites/88/083_20200810_SROG-Exhibit-WitnessLists.pdf

Happy reading. You're very welcome.

James Thum

Mobil: 503-504-6305

On Wed, Aug 12, 2020 at 8:17 AM Jim Classen <classenllc@msn.com> wrote:

James, I think the one item that concerns me they didn't even mention is the small area bounded by faults could rapidly pressure up assuming the faults are pressure sealing. We know some faults are because they trap hydrocarbons. We also know some wells pressure depleted. Lots of unknowns. Jim

Sent from my iPhone

On Aug 6, 2020, at 10:32 AM, James Thum <ferrycanyon@gmail.com> wrote:

There was a mid-June, multi-agency update meeting with them regarding the status and time frames for the application and approval. Feel free to call me if you would like additional details about the discussion. But you are correct: some questions and information requested by the EPA are impossible to provide. Mark and I felt that some of the questions they asked had no bearing on the capacity of the proposed injection zone to accept and trap injected water.

It's my opinion that EPA Region 10 has little technical background in-house about Class II wells and is just trying to cover all the possible bases.

Stay healthy,

James Thum
Mobil: 503-504-6305

On Wed, Aug 5, 2020 at 10:15 PM Jim Classen <classenllc@msn.com> wrote:

Got it

Sent from my iPhone

> On Aug 5, 2020, at 1:38 PM, James Thum <ferrycanyon@gmail.com> wrote:

>

>

> Jim,

>

> I have had extensive discussions with Mark Barton and others regarding the EPA questions and concur with your statement. Some questions have no bearing on the application whatsoever.

>

> James Thum

> Mobil: 503-504-6305

>

>

CERTIFICATE OF SERVICE

I hereby certify that on this ~~14th~~ day of September 2020, I caused to be served a true and correct copy of the following item in Docket No: CC-2020-OGR-01-001: *Continuance And Notice Of Continued Hearing* and *Ex Parte Communication*, by regular mail unless indicated otherwise and addressed to the following:

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Deputy Attorney General
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Joy Vega State House Mail
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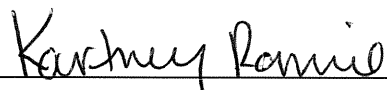
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