

From: [s. brock](#)
To: [Kourtney Romine](#); [Comments](#)
Subject: Comment re Barlow 2-14 well
Date: Wednesday, August 05, 2020 04:26:18 PM
Attachments: [Shelley Brock re Barlow 2-14 well 8-05-20.doc](#)

Kourtney -

Please enter my attached comment regarding the drilling application for Barlow 2-14 gas well into the public record.

Thank you.

Shelley Brock
President, Board of Directors - CAIA
Citizens Allied for Integrity and Accountability
Eagle, ID
(208) 559-6127

From: s. brock
To: Kourtney Romine

Subject: Barlow 2-14 hydrocarbon well
Date: Wednesday, August 5, 2020

Idaho Department of Lands
Attn: Mick Thomas
300 N 6th Street
P O Box 83720
Boise, ID 83720

I am writing on behalf of Citizens Allied for Integrity and Accountability, and *all* Idaho citizens to **request that you deny** the application by Snake River Oil and Gas, LLC, to drill the Barlow 2-14 oil/gas well on the banks, and in the flood plain, of the Payette River in Section 14 of Payette County.

Public records show that drilling and completion operations on the Barlow 1-14 well constructed in that same area in early 2018, were a monumental headache for operators, requiring repeated completion attempts before it was shut-in early that year. Reports are that it remains unstable and would need a lot more work to even attempt to bring it into production. Now Snake River Oil and Gas is proposing drilling a second hydrocarbon well a mere 20 feet from the Barlow 1-14. In the new drilling application the Barlow 2-14 is classified as a 'tight hole'. The industry defines a tight hole as *"....a section of a wellbore where drilling tools with large diameters face resistance. It is basically an open hole. Stabilizers, drill collars, drill pipe, tool joints or parts of a drill string face resistance when a driller drills through a tight hole"*. In other words: complicated and problematic. Given the problems already encountered during drilling in this area of challenging subsurface formations, allowing SROG to attempt to drill a second well just 20 feet away from the first one, could monumentally increase the risks of contamination to aquifers and to the iconic Payette River – source of drinking water for the entire Fruitland community just downstream.

In addition to the details above, the proposed drilling of the Barlow 2-14 just 20 feet from the existing Barlow 1-14 seems to clearly violate state code 47-317(3) b, which mandates the following:

(i) No gas well shall be drilled less than nine hundred ninety (990) feet from any other well drilling to and capable of producing gas from the same pool; and
(ii) No gas well shall be completed in a known pool unless it is located more than nine hundred ninety (990) feet from any other well completed in and capable of producing gas from the same pool.

Furthermore, public records show that there are over 350 domestic water wells in the immediate impact zone of this proposed well. Every one of those water wells is vulnerable to contamination from drilling and completion operations, including: leaks, spills and unauthorized dumping of hazardous chemicals, naturally occurring radioactive materials, heavy metals and toxic carcinogenic substances like Benzene and Toluene – all of which wastewater reports obtained from IDEQ confirms are coming from these wells - along with potential methane migration. IDAPA rules only require baseline testing of 2 domestic water sources within a very short radius of hydrocarbon wells. Since the use of mandatory non-radioactive chemical tracers specific to each hydrocarbon well is not mandated by the state, the other 300 plus homes (over 1,000 citizens), will have no recourse to prevent, or litigate for, damages if and when their water is contaminated, as has happened so many times in other oil and gas producing communities across the US. I would venture a guess that few among them could afford the \$600 - \$800 it would cost to have their own baseline testing performed by an independent third party so that it will hold up in court.

The abysmal bonding amounts required by the state of Idaho offer little to no compensation if the aquifers, river and water source for Fruitland and other downstream communities become polluted, or there is a fire or explosion at the well site or involving any of the other equally

volatile infrastructures. SROG is a conglomerate of 10 other companies from at least 4 different states. This business model works well for the industry in terms of spreading out costs and liability, but it also ensures that any accidents or damages that might incur from their operations will be considerably more complicated and expensive for property owners to litigate. In short, citizens and their property are at the mercy of this company.

Industry representatives here in Idaho have consistently claimed over the past decade that all they are doing is drilling 'conventional vertical wells into soft sand'. As time marches on however, we see that this well and others already drilled are anything but 'conventional' wells. The Barlow 2-14 is slated to be drilled directionally with a 2100 foot deviation from top hole to bottom hole. Others here have also been directionally drilled. In addition, wells have been chemically stimulated through acidizing – without adhering to mandatory protective regulations. Finally, some of these wells have been drilled in smaller than 640 acre tracts of land through spacing exemptions. These details confirm that unconventional oil and gas operations are being carried out here in Idaho. Unconventional drilling greatly increases the potential risks of surface and subsurface water contamination, methane migration into nearby domestic water systems, impacts to the health and safety of human and animal populations, and damages to our sensitive wildlife areas and public lands.

Statistics from the industry themselves show that as many as 6% of all oil and gas wells leak during their construction; that a far higher percentage leak within the first few years; and that over a period of decades **virtually ALL of them will leak**. Cement casings crack and metal pipes corrode over time regardless the quality of materials used, or level of regulatory compliance adhered to. What legacy are we leaving for our kids and future generations by allowing this industry to exploit our mineral resources in residential areas, under our precious rivers and public lands? Mick Thomas stated during today's IOGCC meeting that we see the writing on the wall that the kind of general fund outlay the department has been depending upon for funding *"...is not sustainable given the prognosis of the field and the potential revenue"*. Mr. Thomas also mentioned that even in oil and gas states like Texas activity is down 75 to 80% and there are no new wells being drilled. If the major oil and gas producing states are struggling to keep their operations alive why in the world would we risk punching one more hole through our aquifers here in Idaho where drilling is more difficult and resources are considerably more scarce?

As you review this application for the Barlow 2-14 well, please scrutinize with profound care the long term costs to Idaho families, our rivers and lands versus the potential short term profits and lingering legacy of this out-of-state company. Please do the right thing and deny this application. Thank you.

Sincerely,
Shelley Brock
President, Board of Directors – CAIA
Citizens Allied for Integrity and Accountability
Eagle, Idaho
(208) 559-6127