

IDAHO DEPARTMENT OF LANDS
DIRECTOR'S OFFICE
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Boise ID 83720-0050
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MICK THOMAS, DIVISION ADMINISTRATOR
SECRETARY TO THE COMMISSION

IDAHO OIL AND GAS
CONSERVATION COMMISSION
Betty Coppersmith, Chairman
Marc Shigeta, Vice-Chairman
Jim Classen
Dustin T. Miller

October 5, 2020

Dear Commenter:

You are receiving this letter and documents because you filed comments with Idaho Department of Lands related to Snake River Oil & Gas's application for permit to drill (APD) a Barlow #2-14 well. The Administrator issued a denial of that permit on September 11, 2020. Because you participated by filing a comment, you are receiving a copy of the appeal materials Snake River filed on September 28 and 29.

The person appealing is required by Idaho Code § 47-328(4) to serve a copy of the appeal materials "on any other person who participated in the proceedings, by certified mail." The Idaho Department of Lands has provided service in this matter as it did not include this direction to the operator in its denial of the application for permit to drill. The Idaho Department of Lands will serve those who provided addresses by certified mail, and those who only provided an e-mail address will be served by e-mail.

"Any person who participated in the proceeding may file a response to the appeal with the Oil and Gas Administrator within five (5) days of service of a copy of the appeal materials": Idaho Code § 47-328(4).

The appeal hearing will be held before the Idaho Oil and Gas Conservation Commission on October 20, 2020. A notice of hearing is also included in this mailing.

Sincerely,

A handwritten signature in black ink that reads "Mick Thomas".

Mick Thomas
Division Administrator
Minerals, Public Trust, Oil & Gas
<https://ogcc.idaho.gov>

BEFORE THE IDAHO OIL AND GAS CONSERVATION COMMISSION

In the Matter of Snake River Oil and Gas, LLC.)
Application for Permit to Drill, Barlow #2-14)
Snake River Oil and Gas, LLC. Appellants.)
_____)

NOTICE OF APPEAL HEARING

NOTICE IS HERBY GIVEN that the Idaho Oil and Gas Conservation Commission (“Commission”) will hold an appeal hearing on the above-referenced denial of the application of permit to drill of Snake River Oil and Gas, LLC on Tuesday October 20, 2020 at 2:00pm (MT). The hearing will be held in the State Capitol, Lincoln Auditorium (WW02), Lower Level, West Wing, 700 W Jefferson St., Boise.

The Commission is authorized to conduct this hearing pursuant to Idaho Code §§ 47-316(1)(e) and 47-328. The Commission will take oral argument at the appeal hearing and may set time limits for that argument at the outset of the hearing. The Commission will not allow any new testimony or evidence. Idaho Code § 47-328(5). The Commission shall make a decision at the hearing and issue a written order within five (5) business days of the hearing. Idaho Code § 47-328(5). The Commission’s final order will not be subject to any motion to reconsider. *Id.*

Any person who has participated in the application proceeding may file a response to the appeal within five (5) business days of service of a copy of the appeal materials. Idaho Code § 47-328(4). Responses should be addressed as follows:

Idaho Department of Lands
Attn: Mick Thomas
300 N. 6th St, Suite 103
PO Box 83720
Boise, ID 83720

Responses may also be filed by sending an email to Kourtney Romine at kromine@idl.idaho.gov.

The Commission may take argument from “the appellant and other qualified participating persons at the hearing.” Idaho Code § 47-328(5). That argument can be by telephone or in-person. Persons who choose to argue via phone must email Ms. Romine at the above email address in order to receive the proper call-in participation code. Please note the Commission will give equal consideration to argument in person and argument by telephone. Each person that files a response and plans to give oral argument at hearing should also indicate in their response their intent to participate by telephone or in person.

No public testimony will be accepted. This is because Idaho Code § 47-328(4) provides that the Commission “shall make a decision based on the record below as set forth in the written submittals of only the appellant and any other participating qualified person, the oil and gas administrator’s decision, and any oral argument taken by the commission at an appeal hearing.”

This meeting can be attended both telephonically and in person. Contingent upon safety protocols, the public may attend the meeting in person or via teleconference by dialing 1-877-820-7831 and entering listen-only passcode 1379897. The teleconference number provided is a listen only number. The appellant and other qualified participating persons presenting argument at the hearing need to use the call-in code provided by Ms. Romine if they choose to participate by phone. All in-person attendees must comply with current COVID-19 safety protocols for public gatherings, including face coverings and six-foot physical distancing.¹ Physical distancing measures reduce the meeting room’s normal capacity for public attendance to 50 attendees. The meeting will also be live-streamed for public viewing via a link accessible from the Oil and Gas Commission’s website, <https://ogcc.idaho.gov/>.

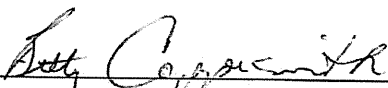
¹ <https://www.cityofboise.org/departments/mayor/coronavirus-covid-19-information/public-health-emergency-order-no-20-12/>
<https://www.cdhd.idaho.gov/pdfs/cd/Coronavirus/Order/Order-Regarding-Restriction-Bars-Open-Ada-County-09-04-2020.pdf>

This proceeding is governed by the 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). A copy of the Rules of Administrative Procedure is available at the Idaho Department of Lands office located at 300 N. 6th Street, Suite 103, Boise, Idaho, and at the Office of Administrative Rules Coordinator's website, accessible at <http://adminrules.idaho.gov>.

Parties requiring the use of telephonic conference at the hearing shall notify Kourtney Romine (kromine@idl.idaho.gov) by 5:00pm (MST) Monday, October 19, 2020.

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 Idaho Department of Lands by 5:00pm (MST) Tuesday, October 13, 2020. Inquiries about scheduling, hearing facilities, etc. should be directed to Kourtney Romine, Workflow Coordinator, Idaho Department of Lands, 300 N. 6th Street, Suite 103, P.O. Box 83720, Boise, ID 83720; e-mail: kromine@idl.idaho.gov; phone: (208) 334-0283.

Dated this 5th day of October 2020.



BETTY COPPERSMITH

Chairman
Idaho Oil and Gas Conservation Commission

SMITH + MALEK
ATTORNEYS

MICHAEL R. CHRISTIAN
Attorney at Law
mike@smithmalek.com
Admitted in Idaho

September 25, 2020

Via Email: mthomas@idl.idaho.gov

Mick Thomas, Division Administrator
Minerals, Public Trust, Oil and Gas
Idaho Department of Lands
P.O. Box 83720
Boise, ID 83720-0200

Re: Application for Permit to Drill, Barlow #2-14

Dear Administrator Thomas:

This law firm represents Snake River Oil and Gas, LLC, the applicant (“Applicant”) on an Application for Permit to Drill for the proposed Barlow #2-14 well (“Application”). On behalf of the Applicant, pursuant to Idaho Code § 47-316(1)(e) we submit this letter as an appeal of your September 11, 2020 letter decision denying the application (“Denial”).

Idaho Code § 47-316(1) provides that application for an APD shall be made “under such rules and regulations as may be reasonably prescribed by the commission[.]” IDAPA 20.07.02.200.04 sets forth the required contents of an application for a permit to drill. It does not require identification of a well with a spacing unit (although it is obvious, in this case, that a well to be drilled in Section 14, which is integrated to all depths, would be within that spacing unit).¹

The Denial concludes, based on limited materials submitted by a previous operator in support of a spacing unit application that was never heard and was ultimately withdrawn, that there is “evidence” that “the drainage area of the proposed Barlow #2-14 target interval extends beyond the unit boundaries of section 14.” As a result, the Denial further concludes that “the Application does not meet the requirements of Idaho Code §47-318 and IDAPA

¹ The OGCC APD form, IDLOGD001.01, is vague. It offers under “Type of Test/Unit” the option of checking “Gas/640 Acre Unit” – which is accurate for the Section 14 unit. It also offers the option of checking “Other/Docket No. _____”, but contains no instructions regarding this option. It is true that the existing Section 14 unit is a 640 acre gas unit.

20.07.02.220.05.d

IDAPA 20.7.02.200.05.d provides that an application may be denied if the proposed well “will result in a waste of oil or gas, a violation of correlative rights, or the pollution of freshwater supplies.” Note that the rule is not phrased in terms of potential. The Denial does not explain which factor in Rule 220.05.d it relies upon – waste, violation of correlative rights, or pollution of freshwater supplies.

“Waste” is defined in Idaho’s Oil and Gas Conservation Act similarly but not identically with respect to gas and oil,² but both definitions concern unreasonable impacts to the ultimate recovery of gas or oil from a pool or reservoir. Idaho Code 47-310(32) defines waste relating to gas as follows:

"Waste" as applied to gas shall include the escape, blowing or releasing, directly or indirectly, into the open air of gas from wells productive of gas only, or gas in an excessive or unreasonable amount from wells producing oil or both oil and gas; and the production of gas in quantities or in such manner as will unreasonably reduce reservoir pressure or unreasonably diminish the quantity of oil and gas that might ultimately be produced; excepting gas that is reasonably necessary in the drilling, completing and testing of wells and in furnishing power for the production of wells.

Meanwhile, Idaho Code § 47-310(33) defines waste relating to oil as follows:

"Waste" as applied to oil means and includes underground waste; inefficient, excessive or improper use or dissipation of reservoir energy, including gas energy and water drive; surface waste, open-pit storage and waste incident to the production of oil in excess of the producer’s above-ground storage facilities and lease and contractual requirements, but excluding storage (other than open-pit storage) reasonably necessary for building up and maintaining crude stocks and products thereof for consumption, use and sale; the locating, drilling, equipping, operating or producing of any well in a manner that causes, or tends to cause,

² While Application was for a gas well, wells in the region have often produced a combination of gas and condensate. Condensate is included in the statute’s definition of oil. See Idaho Code § 47-310(17)(oil includes “other hydrocarbons, regardless of gravity, that are produced at the wellhead in liquid form and the liquid hydrocarbons known as distillate or condensate recovered or extracted from gas.”).

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reduction of the quantity of oil and gas ultimately recoverable from a pool under prudent and proper operations.

There is no evidence contained in the Application materials, and no evidence discussed in the Denial, supporting the conclusion that the well drilled in the requested location would result in any of the conditions constituting waste, i.e., any unreasonable reduction in ultimate recovery, as to either gas or oil. To the extent the denial is based on the conclusion that the requested well “*will* result in a waste of oil or gas,” it is unsupported by fact and arbitrary.

The only fact asserted in the Denial, ultimately, is that the “drainage area of the proposed Barlow #2-14 target interval extends beyond the unit boundaries of section 14.” This assertion is itself based on the assertion that the “geologic limits of the Sand B target . . . appear[] to extend beyond section 14,” which is in turn based on a seismic amplitude map submitted by the previous operator in support of the unprocessed, withdrawn spacing unit application. In other words, the Denial’s conclusion that the “drainage area of the . . . target interval” extends beyond Section 14 is based entirely on a seismic amplitude map suggesting the “geologic limits” of the targeted sand extend beyond Section 14. The conclusion regarding drainage area is not factually supported, as geologic extent based on an amplitude map³ does not establish drainage area. In any case, nothing about these assertions suggests that the proposed well would result in a diminished ultimate recovery from Sand B.

“Correlative rights” are defined in the Act as “the opportunity of each owner in a pool to produce his just and equitable share of oil and gas in a pool without waste.” Idaho Code § 47-310(4). Assuming the denial is based on the same conclusion that the geologic limit of Sand B extends beyond Section 14, this fact by itself does not establish that owners outside Section 14 lack the opportunity to produce from Sand B.

The second fundamental assertion in the Denial is that state-wide spacing pursuant to the Act does not apply, as a “spacing order” exists. The Denial states: “Docket No. 2016-OGR-01-001 contains the current spacing order in place for Section 14. The statewide drilling units found in Idaho Code § 47-317(3)(b) apply only in “the absence of an order . . . establishing drilling or spacing units.” The order in Docket No. 2016-OGR-01-001 (“Order”) does not authorize an additional well to be drilled within Section 14.”

In fact, the Order expressly adopts the “state-wide spacing” scheme. It state in pertinent part:

³ Again, a map submitted by a previous operator, not the Applicant, with no evidence in the record suggesting that the Applicant agrees with the previous operator’s approach or submittal.

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IDAPA 20.07.02.120.02 mandates that a standard state-wide spacing unit area be initially employed for wells drilled in the absence of a Commission Order setting spacing units for the pool. This rule provides in pertinent part that: [e]very well drilled for gas must be located on a drilling unit consisting of approximately six hundred forty (640) contiguous surface acres, which shall be one governmental section or lot(s) equivalent thereto, upon which there is not located, and of which no part is attributable to, any other well completed in or drilling to the same pool.

Orders for Integration, Conclusion of Law (“COL”) 2, p. 8. And:

Based on the current evidence available and provided in these Applications,⁴ establishing the state-wide spacing units for gas wells consisting of approximately 640 acres in Section 14 . . . [is], by operation of law, deemed to result in the most efficient and economic drainage of a common pool or source of supply.

Id., COL 3, p. 8. And:

Establishing and accepting this initial spacing of 640 acres best protects the correlative rights of mineral owners in the spacing unit, absent further information gained from drilling these exploratory wells.

Id., COL 4, p. 9. And:

Thus, the Department accepts and recognizes the initial state-wide spacing of 640 acres for gas wells under IDAPA 20.07.02.120.02 as applicable to the Applications under consideration.

Id., COL 5, p. 9.

The “Orders for Integration” portion of the Order, following the Findings of Fact and Conclusions of Law, addresses only the integration of the spacing unit. The Order pointedly does *not* establish a spacing unit departing from the default state-wide spacing scheme set forth in IDAPA 20.07.02.120.02 (now ensconced in Idaho Code § 47-317(3)(b)). The statement in the Denial that “statewide drilling units found in Idaho Code §47-317(3)(b) apply only in “the absence of an order . . . establishing drilling or spacing units” is in error because, as set forth in

⁴ The application related to Section 14 was processed and heard concurrently with an application relating to Section 19, Township 8 North, Range 4 West (Docket No. 2016-OGR-01-002).

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the Conclusions of Law, the Director expressly accepted the statutory spacing scheme as applicable.

At that time, IDAPA 20.07.02.120.02 provided with respect to gas wells:

Unit and Well Location. Every well drilled for gas must be located on a drilling unit consisting of approximately six hundred forty (640) contiguous surface acres, which shall be one governmental section or lot(s) equivalent thereto, upon which there is not located, and of which no part is attributed to, any other well completed in or drilling to the same pool. In areas not covered by United States Public Land Surveys, such drilling unit shall consist of an area which is: 1) bounded by four (4) sides intersecting at angles of not less than eighty five (85) degrees or more than ninety five (95) degrees; 2) the distance between two (2) points farthest apart thereon shall not exceed eight thousand five hundred (8,500) feet; and 3) shall contain at least six hundred (600) contiguous surface acres. In areas covered by United States Public Land Surveys, such drilling unit shall consist of one governmental section containing not less than six hundred (600) surface acres. A gas well must have a minimum setback of three hundred thirty (330) feet from the governmental section line.

This provision was eventually replaced by what is now Idaho Code § 47-317(3)(b), which provides with respect to gas wells:

Vertical gas wells. Every vertical well drilled for gas shall be located in a drilling unit consisting of either a one hundred sixty (160) acre governmental quarter section or lot or tract, or combination of lots and tracts substantially equivalent thereto, or a six hundred forty (640) acre governmental section or lot or tract, or combination of lots or tracts substantially equivalent thereto. A vertical gas well located on a one hundred sixty (160) acre drilling unit shall have a minimum setback of three hundred thirty (330) feet to the exterior boundaries of the quarter section. A vertical gas well located on a six hundred forty (640) acre drilling unit shall have a minimum setback of six hundred sixty (660) feet to the

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exterior boundaries of the governmental section.

(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.

Thus, under current law, in an area subject to state-wide spacing a gas well is allowed if it is: (a) at least 660' from the section line, and (b) more than 990' from any other well completed in and capable of producing gas from the same pool. The proposed Barlow #2-14 well complies with these restrictions. As set forth in the Application, the proposed target is 803' from the west section line and 670' from the south section line. There is no other well completed in or drilling to Sand B within 990' of the proposed target.⁵

Therefore, the statement in the Denial that the "order in Docket No. 2016-OGR-01-001 does not authorize an additional well to be drilled in Section 14" is incorrect and in error.

This area remains an exploratory basin. The Department appears to be requiring the operator to plan in advance for the most advanced development of a sand at the beginning, rather than allowing what the statutory spacing scheme contemplates – drilling of exploratory wells to test sands, followed by more refined spacing and the drilling of additional wells as warranted.

The Denial violates the correlative rights of the Applicant and its lessors, by denying the Applicant the ability to drill a well in what is a legal location within an established unit, and instead requiring the operator to submit a different spacing application without considering any of the land, geographic or geologic limitations that may impact its ability to do so. The state-wide spacing provisions – including the setbacks from sections lines and distances from other wells producing from a common source of supply – exist for a reason: to allow an operator to know the standards under which it may apply for and drill new wells in an area not otherwise spaced according to different terms. As a result of the Denial: (a) the provisions of Idaho Code § 47-317(3)(b) are improperly rendered a nullity, and operators are left without clear guidance in

⁵ There reference in the Application to the "nearest producing well" being "20 feet" from the proposed well is an erroneous reference to the *surface* location of the wellbore, to be on the same pad as the existing Barlow #1-14 well. The well will be directionally drilled, and the target location is approximately 1900' to the southwest of the surface location, as illustrated on the plat attached to the Application. The existing Barlow #1-14 well is completed in "Sand D," a separate source of supply.

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the law about how to proceed; and (b) mineral owners within the unit are *actually* denied their opportunity to produce their just and equitable share of oil and gas in the pool, in the apparent effort to protect against the hypothetical possibility that other owners *may* be denied an opportunity, without substantial factual basis.

On behalf of the Applicant we respectfully request that the Denial be reversed and the Application granted.

Very truly yours,
SMITH+MALEK

A handwritten signature in black ink, appearing to read "Michael R. Christian", with a long horizontal flourish extending to the right.

MICHAEL R. CHRISTIAN

From: [Michael Christian](#)
To: [Mick Thomas](#); [Kourtney Romine](#)
Subject: Fwd: Barlow 2-14
Date: Monday, September 28, 2020 08:40:51 AM

Dear Administrator Thomas --

Please see the below email from Chris Weiser in support of Snake River Oil and Gas, LLC's appeal of the denial of the Barlow #2-14 APD.

Please let me know if you have any questions.

Thank you.

----- Forwarded message -----

From: **Chris Weiser** <chrisw@weiser-brown.com>
Date: Fri, Sep 25, 2020 at 6:02 PM
Subject: Fwd: Barlow 2-14
To: Michael Christian <mike@smithmalek.com>

Please forward.

Get [Outlook for iOS](#)

From: Chris Weiser <chrisw@weiser-brown.com>
Sent: Friday, September 25, 2020 7:00 PM
To: Chris Weiser
Subject: Barlow 2-14

Dear Administrator Thomas:

I am one of the principals of Weiser-Brown Oil Company, the parent of Snake River Oil and Gas, LLC. I am writing in support of Snake River's appeal of the denial of its application for a permit to drill the proposed Barlow #2-14 well. I am also a commissioner on the Arkansas Oil and Gas Conservation Commission, and I have experience over many years as an operator in Arkansas and other producing states in the region. It is based on that experience that I offer my comments.

In my experience, it is not the norm for the regulator to instruct an operator how it should configure units, or where it should locate wells. Particularly in a wildcat area, default spacing and unit setback requirements exist as a means for operators to drill exploration wells with a level of certainty about where they can drill. After exploratory wells have been drilled, a pool has been tested, and production experience is accumulated, then operators typically request more refined spacing to allow an area to be efficiently drilled out and produced.

Only after this point, and after significant production, do we typically see requests for field-

wide spacing or unit operations. Some reasons for this, as to the unit operations, are:

(a) Generally, pooling a very large area is difficult from a land perspective, and requiring large units at the beginning of exploration would stifle or prevent development, which is the opposite of the desired result. If a large area is rendered undevelopable because of overly burdensome unitization or spacing requirements, the resource is wasted, and the correlative rights of the operator and those desiring development are infringed.

(b) Requiring the formation of a unit over a very large area at the exploratory stage of a field likely will require the operator to divulge proprietary seismic data which is the product of an investment of millions of dollars. With the significant risk that a very large unit may not be granted, the operator is in the position of alerting others to the details of the exploration at a very early stage. This structure will dissuade investment in exploration of the field, which again produces the opposite of the desired result.

Certainly, it is not the ordinary course for the regulator to request that the operator establish a different unit, including a larger multi-section unit, rather than allowing the drilling of a test well in a legal location in a standard spacing unit.

The fact that a sand may extend beyond the boundaries of a unit is not normally a basis for denial of a well permit, if the well will be drilled to a legal location in relation to unit setback requirements. Offsetting mineral owners have options available to them if they believe their correlative rights may be impacted by future production, including drilling an offset well. This is a normal occurrence in other producing states in my experience. Future spacing following the accumulation of production experience will serve to protect correlative rights, while assuring that exploration and production may occur at the outset.

I urge the Idaho Commission to adopt an approach to exploration and development that is consistent with that in other producing states, and allow this exploratory well to be drilled.

Respectfully,
Chris Weiser

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--

Michael R. Christian
Attorney at Law



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For additional information about Smith + Malek, PLLC, including a list of attorneys, please see our website at www.smithmalek.com.

CERTIFICATE OF MAILING

I hereby certify that on this 5th day of October 2020. I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Snake River Oil & Gas LLC
c/o Michael Christian
Smith + Malek
101 S. Capitol Blvd, Suite 930
Boise ID 83702

- Certified mail, return receipt requested
- Hand Delivery
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sarah@smithmalek.com

Chris Weiser
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Mick Thomas
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Kris Grimshaw

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Shelley Brock
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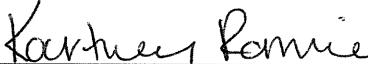
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