

**IDAHO DEPARTMENT OF LANDS  
DIRECTOR'S OFFICE**  
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MICK THOMAS, DIVISION ADMINISTRATOR  
SECRETARY TO THE COMMISSION

**IDAHO OIL AND GAS  
CONSERVATION COMMISSION**  
*Betty Coppersmith, Chair  
Ray Hinchcliff, Vice Chair  
Jennifer Riebe*

August 15, 2023

Nathan Caldwell  
Snake River Oil and Gas /NWGP  
Weiser Brown Operating  
117 E. Calhoun St. (Box 500)  
Magnolia, Arkansas 71753

*via e-mail:* caldwell.nathan@weiser-brown.com  
*via certified mail:* 7016 1370 0000 2329 1648

Re: ML Investments #1-11 (USWN 11-075-20025) Well Status

Dear Mr. Caldwell:

Monthly production records submitted by Snake River Oil & Gas, LLC indicate there has not been reported production from the "UT completion" for the ML Investments #1-11 well, USWN 11-075-20025, Payette County, Idaho since June 2021. Further, production records submitted by Snake River Oil & Gas and its predecessor Alta Mesa Services, LLC indicate there has not been reported production from the "LT completion" since December 2019. Inspections and well visits performed by Idaho Department of Lands on November 29, 2021 and September 29, 2022 indicated that this well was shut-in and not producing at the time of the inspections.

### **Inactive Well Declaration**

Per IDAPA 20.07.02.501.01 the "Department shall declare a well inactive after twenty-four (24) continuous months of inactivity if the owner or operator has not received approval for active status[.]" An inactive well is defined as an "unplugged well that has no reported production, disposal, injection, or other permitted activity for a period of greater than twenty-four (24) continuous months, and for which no extension has been granted." IDAPA 20.07.02.010.24. Based on Snake River's monthly production records and the Department's inspection records, the Department finds that the ML Investments #1-11 well has not had reported production or other permitted activity for greater than 24 months. Additionally, the Department has not received a request for an extension of active status, and thus has not approved any extension. Therefore, the Department hereby declares the ML Investments #1-11 well an inactive well. This letter serves as official notice of the Department's declaration of inactive status by certified mail as provided for in IDAPA 20.07.02.501.01.

You may appeal the Department's decision to the Commission. IDAPA 20.07.02.502.01. Appeals must be filed with the oil and gas administrator within fourteen (14) calendar days of the date

of issuance of this decision. Idaho Code § 47-328(4). Accordingly, any appeal must be filed by **August 29, 2023**. Such appeal shall include the reasons and authority for the appeal and shall identify any facts in the record supporting the appeal. Idaho Code § 47-328(4).

### **Plugging and Abandoning Well / Providing Additional Information**

Further, IDAPA 20.07.02.501.02 states that “an owner or operator must plug and abandon an inactive well in accordance with Section 502 of these rules within six (6) months of being notified by the Department unless the owner or operator supplies the following information within the six-month time period:

- a. A written request to extend inactive status;
- b. An individual bond, as provided for in Subsection 220.03 of these rules, if the well was covered by a blanket bond; and
- c. A description of how the well is closed to the atmosphere with a swedge and valve, packer or other approved method, and how the well is to be maintained.”

Because you have only six months from the date of this letter to plug and abandon this well, please provide the above requested information to the Department within thirty (30) days of the date of this letter. Once the Department has received the above requested information, we will notify you within thirty (30) days of a decision to deny the extension of inactive well status, modify the requested extension or approve the request to extend the inactive status for a period not to exceed three (3) years. See IDAPA 20.07.02.501.03.

### **Application to Convert Well to Active Status**

Per IDAPA 20.07.02.501.05, an inactive well can be converted to active status by filing an application with the Department. If this well has not had a Mechanical Integrity Test (MIT) performed under the requirements of IDAPA 20.07.02.320.01.c in the past five (5) years, an MIT will be required pursuant to that Rule before the well will be declared active.

Thank you very much for your attention to this matter. If you have any questions, please contact me at your earliest convenience.

*Nathan Caldwell*  
*August 15, 2023*  
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Sincerely,

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

Mick Thomas  
Division Administrator  
Minerals, Navigable Waters, Oil & Gas  
Idaho Department of Lands

ecc: Richard Brown, Snake River Oil & Gas, LLC  
Michael Christian, Hardee Piñol & Kracke, PLLC  
James Thum, Idaho Dept. of Lands