

**IDAHO DEPARTMENT OF LANDS  
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**IDAHO OIL AND GAS  
CONSERVATION COMMISSION**  
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May 2, 2024

Michael Christian  
Hardee, Piñol & Kracke PLLC  
1487 S. David Lane  
Boise, Idaho 83705

*via e-mail: mike@hpk.law*

Re: Docket No. CC-2024-OGR-01-001; Application for order to establish spacing unit consisting of the NE  $\frac{1}{4}$  of Section 9 and the NW  $\frac{1}{4}$  of Section 10, Township 8 North, Range 5 West, Payette County, Idaho

Dear Mr. Christian:

This letter serves as acknowledgement that the Idaho Department of Lands (IDL) received the above referenced spacing application on April 29, 2024. As described in Idaho Code § 47-328 (3)(a), "The department shall notify the applicant within five (5) business days of receipt of an application if additional information is required for the department to evaluate the application." After reviewing the spacing application, IDL requests the following additional items to clarify certain parts of the application as submitted.

1. Application letter, page 2, Item 2, paragraph 3 states that an anticipated well in the proposed unit is targeting Sand D, and that development of hydrocarbons from Sand D could be adversely affected by utilizing standard spacing. Exhibit D, Declaration of David M. Smith. Page 4, Item 12 states, "The primary target reservoir sections are Sands A and B." For the record, please correct the Application letter to reflect the sand intervals for which Snake River Oil & Gas LLC is requesting a spacing order.
2. Exhibit A does not indicate the difference between parcels highlighted yellow and unhighlighted parcels. The NE  $\frac{1}{4}$  of Section 9 and the NW  $\frac{1}{4}$  of Section 10 are not labeled. In addition, several parcels are not labeled numerically. This includes the NE corner of the W  $\frac{1}{2}$ , NE  $\frac{1}{4}$  Section 9, the irregular-shaped parcel in the NE corner of the E  $\frac{1}{2}$ , NE  $\frac{1}{4}$  Section 9, the SW corner of the E  $\frac{1}{2}$  NE  $\frac{1}{4}$  Section 9, and most of the W  $\frac{1}{2}$  of the NW  $\frac{1}{4}$  Section 10. Please provide the above labels on Exhibit A.
3. Exhibits A and B of Exhibit D - Declaration of David M. Smith: Please indicate on the seismic profile the positions of targets Sand A and Sand B.

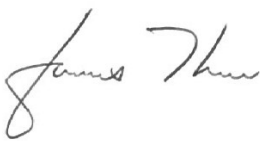
Michael Christian  
May 2, 2024  
Page 2

4. Exhibit C of Exhibit D – Declaration of David M. Smith: Please label the following features on the Amplitude map – Items #1, #2 and #3 in the title block, the brown dashed box, the blue dashed box, the black dashed line (presumed to be referenced in Item 14 of the Declaration), and the two orange dashed lines.
5. A seismic profile from the southeast corner of the brown dashed box on the amplitude map (Exhibit C of Exhibit D) through the black circle labeled as “PBHL”, extending between the brown and green faults, to the northwest corner of the brown dashed box. This seismic profile should use the same display parameters as Exhibit A of Exhibit D, the North-South 3-D Seismic Line.
6. The Notice of Service list for the subject Docket, including addresses of noticed parties, as required by Idaho Code §47-328(3)(b).

IDL has not made a determination regarding the completeness of the application as it pertains to the necessary information as provided in statute. The above request for information is only to clarify certain aspects of the information submitted in the application.

If you have any questions, you can reach me at (208) 334-0243 or [jthum@idl.idaho.gov](mailto:jthum@idl.idaho.gov). Thank you for your assistance.

Sincerely,



James Thum  
Oil & Gas Program Manager  
Minerals, Navigable Waters, Oil & Gas  
Idaho Department of Lands

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