

BEFORE THE IDAHO DEPARTMENT OF LANDS

In the Matter of the Application of Snake River Oil and Gas, LLC for an Order Establishing a Spacing Unit Consisting of the NE ¼ of Section 9 and the NW¼ of Section 10, Township 8 North, Range 5 West, Payette County, Idaho,)	AGCY. CASE NO. CC-2024-OGR-01-001
Snake River Oil and Gas, LLC,)	OAH Case No. 24-320-OG-01
Applicant.)	FINDINGS OF FACT, CONCLUSIONS OF LAW, AND RECOMMENDED ORDER
_____)	

Snake River Oil and Gas, LLC (“Snake River”) filed an application on April 29, 2024, requesting a spacing order for a proposed 320-acre unit consisting of the NE ¼ of Section 9 and the NW ¼ of Section 10, Township 8 North, Range 5 West, Payette County, Idaho (hereinafter “Proposed Spacing Unit”).

On May 17, 2024, Hearing officer Leslie M. Hayes issued a *Notice of Scheduling Conference* that set a scheduling conference May 24, 2024, at 2:00 p.m. on Zoom.

The City of Fruitland filed a letter on May 15, 2024, objecting to establishing the above Proposed Spacing Unit because of its proximity to the city’s “one and only wastewater treatment facility and surrounding infrastructure.” Dept. of Lands written comments.pdf (Stuart Grimes, comment letter).

On May 24, 2024, a Zoom scheduling conference was held. The following individuals participated: Hearing Officer Leslie Hayes; Deputy Attorney General Hayden Marotz, attorney for Idaho Department of Lands (“IDL”); James Thum, Program Manager of Oil and Gas for IDL; Michael Christian, attorney for Snake River; James Piotrowski, attorney for Kate Oltman and Citizens Allied for Integrity and Accountability (CAIA); and Patti Nitz for the City of Fruitland.

Scott Zanzig, Administrative Law Judge, and Xavier Suarez, Legal Extern, from the Office of Administrative Hearings were also present but did not participate in the meeting.

Subsequently, a prehearing order and notice of hearing was entered. On June 10, 2024, a Zoom prehearing conference was held. The following individuals participated: Leslie Hayes, Hayden Marotz, James Thum, Michael Christian, James Piotrowski, and Patti Nitz.

The Hearing Officer held the public hearing at Fruitland City Hall at 1:00 p.m. on June 13, 2024. Michael Christian represented Snake River at the hearing. Wade Moore, a landsman employed at Snake River, and David Smith, a geologist working for Snake River, provided testimony for the applicant. James Piotrowski represented Kate Oltman and CAIA. Deputy Attorney General Hayden Marotz represented IDL, and James Thum provided testimony. The City of Fruitland did not appear. No other uncommitted mineral interest owners or members of the public appeared at the evidentiary hearing.

The parties participating in the hearing were given the opportunity to present testimony and evidence, as well as present opening and closing statements, cross-examine witnesses, and offer rebuttal testimony. Snake River offered Exhibits A, B, C, and D. IDL offered Exhibits IDL-01, 02, and 03. There were no objections to those exhibits, and they were admitted into the record without objection.

Interested persons had the opportunity to present testimony as public witnesses at the hearing on June 13, 2024, beginning at 5:00 p.m., pursuant to Idaho Code § 67-5242(3)(c) and IDAPA 04.11.01.355. No interested members of the public appeared and the hearing concluded at 5:40 p.m. Written comments were received prior to the hearing from the City of Fruitland and Objectors CAIA and Ms. Oltman.

At the close of the evidentiary hearing, the parties requested to submit written closings. A deadline of June 17, 2024, was set. Each party timely submitted a written closing, and the record was closed June 17, 2024, after the closings were filed. The Administrator’s final decision is due July 17, 2024.

PRELIMINARY RULINGS

1. Prior to the hearing, on June 6, 2024, Snake River filed a *Motion for Order Determining CAIA is not a Party*. CAIA did not respond to Snake River’s request to determine it is not a party. Snake River relies on three previous orders from the Administrator of the Idaho Department of Land’s Oil and Gas Program which applied the restriction in Idaho Code section 47-328(3)(b) to determine that CAIA is not a party. *See* Administrator’s August 12, 2021 “Order Determining that CAIA is Not a Party and Denying Petition to Intervene,” entered in Docket No. CC-2021-OGR-01-001; Administrator’s September 15, 2021 “Order Determining CAIA is Not a Party and Denying Petition to Intervene,” entered in Docket No. CC-2021-OGR-01-002; and Administrator’s “Order Determining CAIA is Not a Party,” entered in Docket No. CC-2023-OGR-01-001. Idaho Code section 47-328(3)(b) limits those who can participate in an evidentiary hearing for a spacing order to “uncommitted owners.” CAIA does not claim to be an uncommitted owner and does not assert that there are uncommitted mineral-interest owners in the proposed unit represented by CAIA that are not already identified as participating in the matter. Karen Oltman is already represented and participating in the proceeding as an individual party. CAIA had the ability to participate in the hearing as a public witness, as articulated in IDAPA 04.11.01.355, but chose not to do so. Snake River’s motion to determine CAIA is not a party is **GRANTED**.

2. During the hearing, Mr. Piotrowski requested that Mr. Christian’s remark “I want to go back through some of the statutory sections that Mr. Piotrowski discussed with you. Because

I think he left some things out” be stricken from the record. Tr. 142:3-5. The Hearing Officer **GRANTS** this request and strikes that commentary. It was not considered as part of this Recommended Order and it is recommended that it not be considered as part of the final order.

3. At the close of proceedings, there was a request for the closing briefing to be limited to five pages or less. No formal order was entered, but this Hearing Officer agreed that given the short timeline for closing briefing, that five pages was reasonable. Objectors filed a closing brief that exceeded five pages; despite there being no formal order limiting the length of briefing, Objectors’ request that the entire brief be considered is **GRANTED**.

FINDINGS OF FACT

1. Snake River filed its application for a 320-acre spacing unit consisting of the NE ¼ of Section 9 and the NW ¼ of Section 10, Township 8 North, Range 5 West, Payette County, Idaho, on April 29, 2024. *Order referring Matter to the OAH, Attachment 1*. Snake River’s application included a Declaration of its geologist consultant David Smith, who had previously mapped areas of the Snake River basin. *Id.*

2. On May 2, 2024, IDL’s James Thum requested more information from Snake River in its supporting exhibits. *Id. at Attachment 3*. On May 3, 2024, Snake River updated all the requested information and submitted revised exhibits. *Id. at Attachment 4*.

3. On May 6, 2024, Snake River mailed a copy of the May 3, 2024, application by certified mail to all uncommitted mineral interest owners within and adjacent to the proposed spacing unit. *SROG-Proof of Mailings 5/08/24; Tr. 8:15-25*.

4. James Piotrowski filed an objection on behalf of Kate Oltman and CAIA requesting that Snake River’s application be denied. They argued two points: that the Proposed Spacing Unit

was simultaneously under-inclusive and over-inclusive, and that Snake River failed to give proper notice of the application.

5. Snake River gave notice by mail to all the uncommitted owners within the proposed spacing unit, and to all adjacent uncommitted owners. Tr. 8:15-25. In addition, Payette County was also mailed notice. *Id.* No working interest owners other than Snake River were within or adjacent to the proposed unit. Tr. 9:1-8

6. David Smith, Snake River's geologist/geophysicist, testified. Mr. Smith graduated from Virginia Tech in 1983 with a Bachelor of Science in geology with additional geophysics classes. Tr. 17:14-19. He has over 40 years of experience as an oil and gas geologist and has worked in Idaho since 2012. Tr. 17:14-1:5, 18:20-19:15. Mr. Smith explained how he used various methods to reach his conclusion that there likely are gas pools under the proposed unit. Tr. 20:18-20. First, he explained how a 3D seismic scan was conducted using sensitive recording equipment over the course of three years, 2013, 2014, and 2015. Tr. 22:10-25. Second, he described how he examined all of the data from previous wells in the area. Tr. 23:24-25. In particular, the neighboring Fallon 1-10 well encountered the same desired Sands A and B. Tr. 26:1. Mr. Smith's testimony regarding the location of possible hydrocarbons is credible and unrebutted by any expert testimony. The only other relevant testimony received, from Mr. Thum, corroborated Mr. Smith's opinions. It is more likely than not that there is natural gas in Sands A and B in the mapped area within the proposed unit.

7. The first exhibit Mr. Smith displayed (Exhibit C) was an 'Amplitude Map' of the area which also has the proposed spacing unit outlined in a maroon box. Tr. 28:14. The amplitude map shows that the gas pool is roughly in the middle of the proposed unit. The north and east part of the proposed unit is blocked in by two fault lines, which are correspondingly marked on Exhibit

A. Tr. 47:15-18. The fault lines do not connect, and there is a little bit of space showing low amplitude between them. Tr. 48:15. To the west, the amplitude strength weakens, and the gas pool terminates. Exhibit C. The southern boundary is another spacing unit, and there is low amplitude between the two units. *Id.* Mr. Smith testified that it was possible but unlikely that anything to the southwest of the proposed unit would be drained by the well. Tr. 96:22-25.

8. Exhibits A, B, and D presented by Mr. Smith were 3D Seismic Line graphs constructed with the seismic data obtained in 2013-15. They display data depicting expected Sands A and B. They correspond with the gas pool displayed in the amplitude map in Exhibit C and support its conclusions.

9. Mr. Smith additionally testified that Snake River would not be creating waste, and that there would be no venting of hydrocarbons into the atmosphere. Tr. 106:5-7. This testimony was credible and unrebutted.

10. Following Mr. Smith's testimony, James Thum testified. Mr. Thum has been the oil and gas program manager for IDL since January 2016. Tr. 108:19-109:1. He has a Bachelor of Science degree in geology (received in 1981) and a Master of Science in geophysics (received in 1983) and over thirty years' experience in the field. Tr. 109:5-109:20. He credibly testified that the Western Snake River Basin is one of the "most recently discovered conventional producing areas in the country" and, as such, a large amount of technical information has not yet been formed. Tr. 110:22-25. As a result, 3D seismic surveys and information from the neighboring Fallon 1-10 well are the most reliable data for this proposed spacing unit. Tr. 111:1-11. Mr. Thum described Snake River's data as being "good quality" and accepted within the industry. Tr. 111:4. Mr. Thum further explained that the methodology employed to map this proposed unit is consistent with every well drilled in Payette County since the first 3D seismic survey in 2012. Tr. 113:9-11. Mr.

Thum's testimony supports the conclusion that it is likely Sands A and B below the proposed unit contain deposits of natural gas.

11. The first exhibit Mr. Thum introduced was IDL-01, a map of the Harmon Field area with the proposed unit marked with a green box. The map shows two other nonstandard size units (labeled A and E). Mr. Thum testified that a nonstandard size spacing unit like the one proposed is consistent with the development of the Harmon Field area. Tr. 115:1.

12. The second exhibit was IDL-02, a depth interval graph and a density neutron combo well log from the Fallon 1-10 well for Sand A. Its data corresponded with Mr. Smith's exhibits and showed a high likelihood there would be hydrocarbons in the proposed spacing unit. Tr. 116:16. The third exhibit Mr. Thum displayed, IDL-03, was a similar graph for Sand B. It indicates the likely presence of hydrocarbons in Sand B. Tr. 117:22-24.

13. Mr. Thum testified that IDL's recommendation was approval of the proposed spacing unit. Tr. 119:4. The recommendation was based upon the information submitted by Snake River, the supplemental information requested and received by IDL, and the well log information from the Fallon 1-10 well to the south. Tr. 118, 119:20-25, 1-22.

14. During cross examination, Mr. Thum was asked if it was possible to describe the gas pool in an irregular fashion, instead of a rectangle, while being in accordance with the Public Land Survey System. Tr. 137:16. Mr. Thum responded that it was possible but also that units were practically never described that way, if ever. Tr. 137:25. Mr. Marotz asked Mr. Thum if it was possible to know with enough certainty the boundaries of a hydrocarbon pool to draw a line on the surface that exactly corresponds to the underground pool. Tr. 151:22. Mr. Thum responded that it was not possible. Tr. 152:3-5. Mr. Thum's statements on the nature of the Public Land System are

credible, and drawing an irregular map closely following the suspected subterranean gas deposit is extremely difficult based off the evidence in the record.

15. Other than his cross-examinations, Mr. Piotrowski declined to present any evidence on behalf of Kate Oltman or CAIA and the hearing was concluded with no evidence or testimony from objector Oltman or CAIA. Tr. 153:12.

CONCLUSIONS OF LAW

A. The Hearing Officer has jurisdiction over this matter.

1. The Administrator is authorized to conduct this hearing and appoint a hearing officer pursuant to Idaho Code sections 47-317 and -328 for the purpose of conducting hearings. This proceeding governed by the Idaho Oil and Gas Conservation Act (Chapter 3, title 47, Idaho Code); and the Rules Governing Conservation of Oil and Natural Gas in the State of Idaho (IDAPA 20.07.02).

2. The Office of Administrative Hearings (“OAH”) is authorized to conduct the hearing with its Hearing Officer pursuant to Idaho Code § 67-5280(2)(b) as a requested hearing by the agency.

3. 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.

4. 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 sections 47-314(7), -317, and -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. Snake River provided adequate notice.

1. Idaho Code sections 47-328(3)(b) and -317(5) set forth the applicable notice requirements. First, § 47-328(3)(b) requires that the applicant give notice to “all known and located uncommitted mineral interest owners, all working interest owners within the proposed spacing unit, and the respective city or county where the proposed unit it located.” Snake River has satisfied these requirements. As Wade Moore testified, and the record shows, there are no working interest

owners and Payette County was notified. Tr. 9:1-8. All of the uncommitted mineral interest owners within and adjacent to the proposed spacing unit were locatable and notified. Tr. 8:15-25.

2. Objectors argue that the notice requirement here for uncommitted mineral interest owners requires notice be given to all owners in the entirety of both default 640-acre spacing units that would apply without IDL establishing a new spacing unit above the expected deposits.¹ This is an unnecessarily broad reading of the statute. Presently there is an application before IDL to establish a spacing unit; all of the uncommitted owners in the unit or nearby were notified of the application. The Hearing Officer finds that sufficient notice has been provided pursuant to Idaho Code section 47-328(3)(b).

3. Idaho Code section 47-317(5) requires that the applicant “shall provide proper notice . . . to all uncommitted owners within the proposed unit and to all other parties an operator reasonably believes may be affected.” Snake River mailed notice to all uncommitted owners within the proposed unit, as well as all adjacent owners. Snake River had no statutory requirement to mail notice to any other owners.

D. The proposed spacing unit is established as a spacing unit under Idaho Code §§ 47-317(1) and (2).

1. Idaho Code section 47-317(1) grants IDL the power to “issue an order establishing spacing units on a statewide basis, or for defined areas within the state, or for oil and gas wells drilled to varying depths.” Section 47-317(2) sets forth the two criteria IDL must find to establish a spacing unit. This is the authority to establish the spacing unit Snake River has applied for. Objectors argue that section 47-317(5) controls and the Snake River failed to demonstrate that

¹ It is unclear if Objectors even have standing to raise this argument as a deficiency. The only objector with party status is Ms. Oltman, who did in fact receive notice of the Application. *See* SROG Ex. 2.

“such *amendment* would assist in preventing the waste or oil and gas, avoid drilling of unnecessary wells, or protect correlative rights.” I.C. § 47-317(5) (emphasis added). The Proposed Spacing Unit here seeks to establish a spacing unit, not to amend a spacing unit, rendering Idaho Code section 47-317(5) inapplicable to these proceedings.

2. Examining section 47-317(2), a spacing order in Idaho “shall specify the location, size, and shape of the unit, which, in the opinion of the department, shall result in the efficient and economical development of the pool as a whole.” In addition, the Department “shall issue an order establishing a spacing unit or units to determine the area that can be efficiently and economically drained by one (1) well for the orderly development of the pool.” I. C. § 47-317(2). Thus, Snake River must show sufficient evidence to establish that the spacing unit will efficiently and economically drain the pool as whole with one well.

3. In this case, to determine whether the proposed spacing unit will result in the “efficient and economical development of the pool as a whole[,]” the Hearing Officer must evaluate evidence of both the efficiency and economics of developing the pool. In other words, evaluating “efficiency” of developing the pool alone or the “economics” of the developing the pool alone would not follow the statute. These two quantifiers cannot be separated. Used together the words “efficient and economical” includes minimizing waste, preventing the drilling of unnecessary wells, and incurring unnecessary expense while maintaining the economic development of the pool.

4. The proposed spacing unit satisfies these two criteria. Mr. Thum testified that the applicant’s requested spacing unit would be economically and efficiently drained by one well. Tr. 135:12. It was repeatedly testified by Mr. Smith and Mr. Thum that there would be no waste during the drilling. *See* Tr. 106:5-7 and Tr. 135:12. This testimony was supported by a large mass of

evidence at the hearing, and zero testimony or evidence was provided by Objectors that the spacing unit would not result in the economical and efficient drainage of the hydrocarbon pool.

5. Idaho Code section 47-317(2) requires that the spacing unit is created in accordance with the Public Land Survey System (PLSS). Mr. Thum's testimony is credible that every other State uses rectangles to distinguish spacing units in the PLSS. Tr. 136:14-16. Considered in conjunction with Mr. Smith's testimony where he explained that another geologist would "absolutely, 100%" draw the amplitude map differently, the Hearing Officer finds that drawing the spacing unit closely around the gas pool's irregular shape is a difficult task. Tr. 88:24. Idaho Code section 47-317(2) does not require this irregular mapping and the Hearing Officer finds that a rectangular shape is appropriate for the Public Land Survey System.

6. The proposed spacing unit is not over or under-inclusive. Although it contains some ground with no suspected oil or gas, as Mr. Thum testified, seismology is an uncertain science. Tr. 152:3-5. The pool may be larger or smaller than what is currently believed. The proposed spacing unit adequately compensates for this. Additionally, none of the exhibits or testimony suggested that there is more oil and gas beyond the boundaries of the proposed spacing unit that would be economically or efficiently developed by a well within it. Objectors presented no testimony or evidence about how a larger spacing unit would affect their own rights and ability to develop her minerals.

7. Even if this was a situation governed by Idaho Code section 47-317(5), the proposed spacing unit is still adequate. Idaho Code section 47-317(5) permits for amending a spacing unit to "protect correlative rights." A larger spacing unit, such as one twice in size as suggested by Objectors, would be detrimental to the correlative rights of owners in the proposed spacing unit by including large amounts of unproductive acreage that no evidence suggests will be

developed by the proposed well. The second amendment condition, preventing the drilling of unnecessary wells, is also satisfied. As Mr. Thum testified, drilling is an uncertain practice and geologists never quite know what they will find until the well is dug. Tr. 128:9. Rather than double the size of the spacing unit and risk encompassing more gas than intended in the unexplored regions, it makes sense to space appropriately around this known pool. This prevents the speculative risk of possibly requiring multiple wells within the spacing unit. Regarding the prevention of waste, Snake River repeatedly testified that they would not be venting any hydrocarbons into the atmosphere or creating waste. Tr. 106:5.

E. The City of Fruitland's objection is factually unsupported.

1. The City of Fruitland raised several unsupported statements warning of interference with the wastewater treatment plant. Other than these statements, the City has not provided any evidence that they have concerns within the jurisdiction of the Oil and Gas Commission for purposes of establishing a spacing unit. Accordingly, the establishment of a spacing unit is not the proper place for their opposition. Idaho Code sections 47-317(1) and (2) govern the establishment of a spacing unit and are only concerned with the efficiency and economical sense of the unit.

RECOMMENDED ORDER

Based on the reasons stated above, pursuant to Idaho Code sections 47-317 and -328 and based on evidence in the record, the Hearing Officer recommends that the Proposed Spacing Unit in Docket No. CC-2024-OGR-01-001, OAH Case No. 24-320-OG-01 be **GRANTED** according to the terms and conditions requested by the Applicants as modified by the terms and conditions contained therein.

///

///

RECOMMENDED ORDER NOTICE

This is a recommended order of the hearing officer. It will not become final without action of the Administrator. By law, the Administrator must issue a final order within thirty (30) days of the close of the evidentiary portion in this case, which occurred on June 17, 2024, when the parties submitted written closing statements. *See* Idaho Code § 47-328. The Administrator's final order in this case **must be issued by July 17, 2024.**

Pursuant to Idaho Code section 47-328(3)(e) “[t]he [A]dministrator’s decision shall not be subject to any motion for reconsideration or further review, except for appeal to the commission[.]”

IT IS SO ORDERED.

DATED: July 10, 2024.

OFFICE OF ADMINISTRATIVE HEARINGS

/s/ Leslie M. Hayes
Leslie M. Hayes
Deputy Chief Administrative Hearing Officer

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of July, 2024, I caused to be served a true and correct copy of the foregoing by the following method to:

Snake River Oil & Gas LLC
c/o Michael Christian
Hardee, Pinol & Kracke PLLC
1487 S. David Lane
Boise ID 83705
Counsel for Applicant

U.S. Mail
 Email:
mike@hpk.law

Hayden Marotz
Idaho Department of Lands
Deputy Attorney General
PO Box 83720
Boise ID 83720-0010
Counsel for IDL

U.S. Mail
 Email:
hayden.marotz@ag.idaho.gov

James Thum
Idaho Department of Lands
PO Box 83720
Boise ID 83720-0050
IDL Program Manager, Oil and Gas

U.S. Mail
 Email:
jthum@idl.idaho.gov

Kourtney Romine
Idaho Department of Lands
PO Box 83720
Boise ID 83720-0050
IDL Workflow Coordinator

U.S. Mail
 Email:
kromine@idl.idaho.gov

Patti Nitz
Payette County Planning and Zoning
1130 3rd Ave. N. # 107
Payette, ID 83661
Payette County

U.S. Mail
 Email:
pnitz@payettecounty.org

Fallon Enterprises
Larry James
Leased

U.S. Mail
 Email

Garman & Sons, Inc.
Leased

U.S. Mail
 Email

Fern Marie Robinette
1255 Allen Ave, Apt. 104
Fruitland, ID 83619
Unleased

U.S. Mail
 Email:

Robert and Sue Hewett
1400 N. 8 Avenue
Payette, ID 83661
Unleased

U.S. Mail
 Email:

City of Fruitland
P.O. Box 324
Fruitland, ID 83619
Unleased

U.S. Mail
 Email:

Payette River
Idaho Department of Lands
Leased

U.S. Mail
 Email:

Highway 95
Idaho Transportation Department
Leased

U.S. Mail
 Email:

Idaho Northern & Pacific Railroad
1400 Douglas ST Stop 1640
Omaha, NE 68179
Unleased

U.S. Mail
 Email:

James E Way
9000 Washoe Rd
Payette, ID 83661
Adjacent Owner

U.S. Mail
 Email:

Nelson Metal Tech
8952 Washoe Rd,
Payette, ID 83661
Adjacent Owner

U.S. Mail
 Email:

Rickey G. Griffin
1247 NW 8 Ave
Payette, ID 83661
Adjacent Owner

U.S. Mail
 Email:

Timothy E Lefebvre
8700 Shannon Rd

U.S. Mail
 Email:

Payette, ID 83661
Adjacent Owner

Robert Harris
8660 Shannon Rd
Payette, ID 83661
Adjacent Owner

U.S. Mail
 Email:

Karen Le Oltman
8970 Hurd Ln
Payette, ID 83661
Adjacent Owner

U.S. Mail
 Email:

OAH
P.O. Box 83720
Boise, ID 83720-0104
Located at: 350 N. 9th., Suite 300
(208) 605-4300

Email:
filings@oah.idaho.gov

OFFICE OF ADMINISTRATIVE HEARINGS

/s/ Leslie M. Hayes
Leslie M. Hayes