

Idaho Department of Lands

Director's Office
300 N. 6th Street, Suite 103
P.O. Box 83720
Boise, ID 83720-0050
Phone (208) 334-0200



Dustin T. Miller, Director
Working Lands, Trusted Stewards

**Idaho Oil and Gas
Conservation Commission**

Ray Hinchcliff, Chair
Jennifer Riebe, Vice Chair
Marg Chipman
Marc Haws
Shannon Chollett, Secretary

January 15, 2025

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

via email: mike@hpk.law

Sent Certified Mail – Return Receipt Request – 7016 1370 0000 2329 1631

Re: ML Investments # 1-11 (USWN 11-075-20025) Request to Extend Inactive Well Status

Dear Mr. Christian:

The Idaho Department of Lands (the Department) received your January 13, 2025, request to extend inactive status for the ML Investments #1-11 well (USWN 11-075-20025) (ML #1-11) operated by Snake River Oil & Gas, LLC (SROG) in the state of Idaho. The stated purpose for the request is to allow for possible recompletion operations in the upper lobe of Sand 1, which occurs between 4130 feet and 4195 feet measured depth, and for the potential use of the ML #1-11 as a monitoring well for Class II injection operations on the DJS Properties #2-14 well. The request seeks an extension of inactive status to December 19, 2026 from the current January 20, 2025, plug and abandon deadline.

Extension of Inactive Status

Per IDAPA 20.07.02.501.03, “[t]he Department shall review the request [to extend inactive status] for approval, modification or denial[.]” A request for extension of inactive status must also be accompanied by (i) an individual well bond, (ii) “a description of how the well is closed to the atmosphere” using an approved method, and (iii) a description of “how the well is to be maintained.” IDAPA 20.07.02.501.02(a)-(c).

Having reviewed SROG’s request for extension, a copy of the mechanical integrity test (MIT) performed January 8, 2025 on the 7-inch production casing, the description of how the well is currently closed to the atmosphere, the designation of this well as a monitoring well for Class II injection operations under EPA permit number ID-2D001-A, and \$150,000 individual bond currently posted for the ML #1-11, the Department will approve SROG’s request for extension of inactive status. Accordingly, the ML #1-11 will remain in inactive status until **December 19, 2026.**

The new plug and abandon deadline of December 19, 2026, coincides with the expiration deadline for EPA permit number ID-2D001-A. If that permit expires, there will no longer be a

need to utilize ML #1-11 as a monitoring well, so an extension past December 19, 2026, is not warranted at this time.¹

Conditions of Inactive Status

The extension of Inactive status for the ML Investments #1-11 is approved, subject to the following conditions:

1. Snake River Oil & Gas will provide surface-production casing annulus pressure data, and production casing-tubing string annulus pressure data to the Department by the 14th day of each month for the remainder of the extension period.
2. Snake River Oil & Gas will provide a written report to the Department on the status of the Class II permit well construction activities and any operations relating to the ML Investments #1-11 within thirty (30) days (**February 14, 2025**) and every six (6) months for the remainder of the extension period.

SROG may appeal the Department's decision to the Oil and Gas Conservation Commission (OGCC). 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 **January 29, 2025**. 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).

Should you have any questions, please contact me at 208-334-0298.

Sincerely,



Shannon Chollett
Division Administrator
Minerals, Navigable Waters, Oil & Gas

ec: Richard Brown, Snake River Oil & Gas, LLC: richard@weiserbrown.email
Nathan Caldwell, SROG and NWGP: caldwell.nathan@weiser-brown.com
James Thum, Idaho Department of Lands: jthum@idl.idaho.gov

¹ If SROG obtains an extension of EPA permit number ID-2D001-A, this Order will not preclude SROG from filing a subsequent request for an extension of inactive status with the Department.