James Thum

From: Owsley, Dennis < Dennis.Owsley@idwr.idaho.gov>

Sent: Friday, May 16, 2025 11:23 AM

To: James Thum
Cc: Hersley, Chad

Subject:RE: Snake River Oil & Gas - proposed well treatment applicationAttachments:ML Investments 2-10 Well Treatment Application Comment Letter.pdf

Categories: Applications / Hearings, Operations & Inspections

James

Attached are IDWR's comments regarding the application.

Feel free to reach out to me with any questions, comments, or concerns.

Thanks Dennis

Dennis Owsley, P.G.
Technical Hydrogeologist
Idaho Department of Water Resources
322 E Front St
Boise, ID 83720
(208) 287-4855

From: Hersley, Chad <Chad.Hersley@idwr.idaho.gov>

Sent: Friday, May 2, 2025 3:01 PM

To: Owsley, Dennis < Dennis. Owsley@idwr.idaho.gov>; James Thum < jthum@idl.idaho.gov>

Subject: FW: Snake River Oil & Gas - proposed well treatment application

Thank you James,

I am going to ask Dennis run through this application. I will be out most of next week.



Chad Hersley, PG | Ground Water Protection Section Manager Idaho Department of Water Resources

322 E Front Street | Boise, ID 83720-0098

Office: (208) 287-4930

From: James Thum < jthum@idl.idaho.gov> Sent: Thursday, May 01, 2025 2:34 PM

To: Hersley, Chad < Chad.Hersley@idwr.idaho.gov>

Subject: Snake River Oil & Gas - proposed well treatment application

Chad,

Attached is a copy of an Application to Treat a Well for the ML Investments #2-10, T8N R4W Section 10, Payette County. IDL is sending this copy as required under Idaho Code § 47-316(1)(b). Please note that this application contains no redactions, i.e., no part of this application is exempt from public disclosure. The department has not requested any additional information from the operator regarding the application at this time. Per IDAPA 20.07.02.210.07.c, the Department will also be working with Idaho Department of Environmental Quality (IDEQ) for recommendations on freshwater monitoring plans proposed by the operator as a requirement for the well treatment.

You may email any comments to me at this email address. Historical construction information for the ML Investments #2-10 can be found on the OGCC Well & Facilities web page.

If you have any questions regarding the application, please don't hesitate to contact me.

Please let us know of any comments you may have by end of business, Friday, May 16, 2025.

Best regards,

James Thum Oil & Gas Program Manager

Idaho Department of Lands 300 N. 6th Street, Suite 103 Boise, Idaho 83702

Direct: (208) 334-0243 Mobile: (208) 912- 5014 https://ogcc.idaho.gov/





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Governor Brad Little

Director Mathew Weaver

05/15/2025

James Thum
Oil and Gas Manager
Idaho Department of Lands
300 N. 6th Street, Suite 103
Boise, ID 83702

Subject: Snake River Oil and Gas ML Investments 2-10 Well Treatment Application

API Number: 11-075-20022

Dear James,

The application for well treatment of ML Investments 2-10 Well was reviewed with respect to any potential impacts to nearby existing wells and the aquifer of the area. A review of the Idaho Department of Water Resources (IDWR) well construction database indicates that only one well exists within a one-quarter mile radius of ML Investments 2-10 Well, as stated in the application.

Expanding the search radius to one mile, 12 wells are listed in the IDWR well construction database (Table 1, Figure 1). The depths of these wells range from 37 to 640 feet deep, significantly above any open intervals of the ML Investments 2-10 Well (uppermost open intervals are 4,000 feet bls). In addition, the well is isolated from the aquifer by having three concentric strings of cemented casing that eliminate any communication with the aquifer and this well.

Table 1. IDWR Well Construction Database results within 1 mile of ML Investments 2-10 Well.

				TotalDepth	<u>Data</u>	
<u>Owner</u>	<u>Township</u>	Range	<u>Section</u>	<u>(ft)</u>	<u>Source</u>	<u>WellID</u>
SAMUEL DAVIS	08N	04W	9	220	QQ	291011
PETE ACAITUREI	08N	04W	9	215	QQ	388857
C H NELSON	08N	04W	10	37	QQ	377306
PAYETTE FARMS CO	08N	04W	10	71	QQ	387880
C H NELSON	08N	04W	10	66	QQ	402757
MRS JOHN HANSEN	08N	04W	10	187	QQ	293534
ANN GLOVER	08N	04W	3	185	QQ	290564
DILLON L WILSON	08N	04W	3	185	QQ	346482
RALPH CRAWFORD	08N	04W	3	240	QQ	293017
ALBERT MITCHELL	08N	04W	3	183	Digitized	377199
GLOBAL CATHODIC PROTECTION	08N	04W	10	200	GPS	440252
PHILL DODDS	08N	04W	9	640	Digitized	473433

The applicant includes a freshwater monitoring program in which the nearest domestic well will be sampled prior to and following the proposed well treatment. This monitoring program will provide justification that the activities and production of this well will not have an impact on the aquifer or any existing wells in the vicinity of the project.

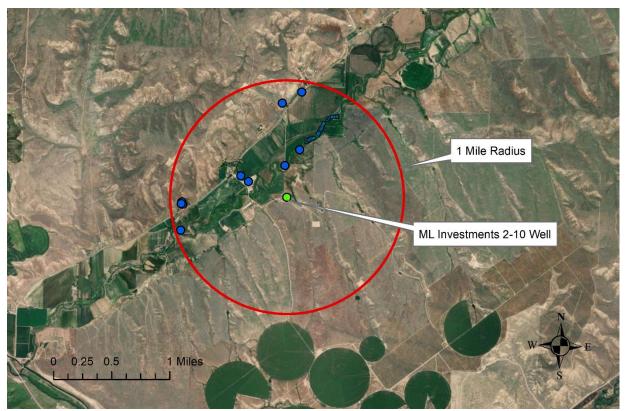


Figure 1. Existing well locations based on the IDWR database within 1 mile of ML Investments 2-10 Well.

In summary, since the open intervals of the ML Investments 2-10 Well are significantly deeper than any of the surrounding domestic wells completed in the aquifer and assuming the casings and seals are in place and of strong structural integrity, the proposed well treatment should not have any negative impacts on the underlying aquifer or surrounding domestic wells.

Please feel free to reach out to me with any questions, comments, or concerns.

Sincerely,

Dennis Owsley

Dennis Owsley, P.G.
Technical Hydrogeologist
Idaho Department of Water Resources
(208) 287-4855
Dennis.owsley@idwr.idaho.gov