



IDAHO DEPARTMENT OF
WATER RESOURCES

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Governor Brad Little

Director Mathew Weaver

November 3, 2025

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

RE: Permit to Drill -- Twin Peaks 1W

Dear Mr. Thum,

The Idaho Department of Water Resources (IDWR) appreciates the opportunity to provide comments related to the upcoming drilling of Twin Peaks 1W stratigraphic test well in Canyon County.

Groundwater Resources

A review of the submitted application was conducted with respect to existing wells and water resources in the vicinity of the project. With respect to existing wells, the IDWR database includes 30 wells within one mile of the proposed drilling location (Figure 1). The existing wells are predominately domestic wells for potable usage, with eight irrigation wells and one drainage well existing. The depths of the wells range from 47 to 500 feet deep (Table 1). It should be noted that the physical locations of the wells have not been verified in the field but are based on the spatial data assigned to the wellhead through the IDWR database.

According to the application, the well will have approximately 80 feet of conductor pipe cemented in place in addition to 800 feet of surface casing and 3,500 feet of intermediate casing, both cemented to the surface. The application indicates that all strings of casing will be pressure tested and cement integrity will be confirmed with cement bond logs. Therefore, assuming the casing and seals proposed for this well are installed as proposed, all shallow ground water within the vicinity of this well will be protected and isolated from the drilling activities.

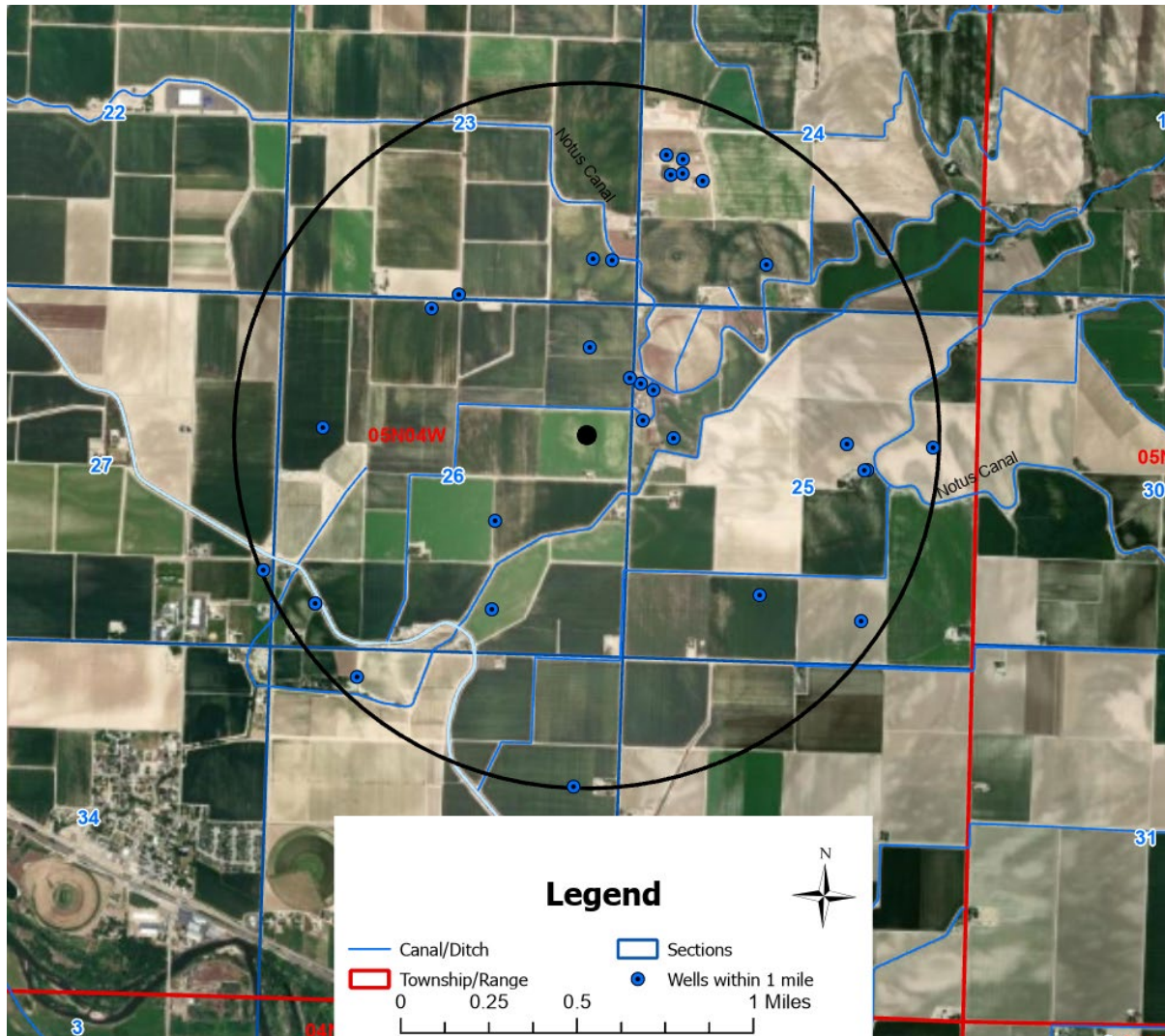


Figure 1. Map showing existing wells with one mile of proposed well pad and nearby surface water features.

Surface Water Resources

A review of nearby surface water features was conducted to evaluate any potential impacts to any nearby rivers, streams, canals, or ditches. According to the application, the proposed well site is approximately 375 feet south of an unnamed irrigation ditch (Figure 1). The Conway Gulch, another irrigation feature, is approximately 1,000 feet to the southeast of the wellhead. The Notus Canal flows to the northeast of the wellhead approximately 1,250 feet away. The Boise River is approximately 1.75 miles south of the proposed wellhead location.

The application indicates that the drill site will be graded and sloped to minimize any runoff from the well pad. In addition, erosion and sediment control BMPs will be determined based on site conditions to ensure runoff does not occur and impact any nearby surface water features. As long as the BMPs and BOPs proposed for the drilling activities are emplaced as proposed, the threat to nearby surface water features from the drilling activities is minimized.

Table 1. Existing wells within one mile of proposed well.

Owner	Construction Date	Well Use	Casing Depth (ft)	Total Depth (ft)	WellID
A W ANDREWS	7/5/1958	Domestic	130	265	385082
AARON VOLLMER	1/12/2006	Domestic	50	60	408534
ANDY OSMUS	8/9/2007	Domestic	76	86	418316
ANNA LEPETSKYY	11/17/2021	Domestic	121	128	467372
ARNOLD AGUILAR	11/24/2013	Domestic	124	127	436728
BILL BROCK	10/2/2009	Domestic	148	156	427237
BOB WHITMIRE	1/15/1984	Domestic	110	121	306702
BOB WHITMIRE	10/9/1971	Domestic	112	124	361612
BRENT A POWELL	4/18/1994	Domestic	59	80	300777
CLAUDE E SELLS	11/11/1970	Domestic	129	140	369608
DARIN WEST	4/21/2006	Domestic	118	118	409614
DAVID JOHNSON	11/25/2003	Domestic	136	142	379997
DAVID MARCHBANKS	3/18/2024	Irrigation	337	500	477408
EDWARD GOODSON	9/2/1976	Domestic	46	47	393471
ERVIN A PICKREL	4/16/1977	Irrigation	119	120	372581
J A MATCHBANKS	4/19/1977	Irrigation	179	180	372562
JASEN BROCK	7/13/1999	Domestic	68	79	294905
JON C WATSON	9/3/1981	Irrigation	235	245	398932
JOSE CRUZ	10/8/2024	Domestic	105	116	481531
LINDSAY REYNOLDS	7/11/2019	Domestic	112	118	455411
M & W FARMS INC	5/23/1977	Irrigation	138	275	372560
MARCHBANKS LP	11/11/2016	Irrigation	276	290	445906
NOTUS HOP CO INC	2/28/1967	Drainage	48	48	369610
PETER LUNGU	3/25/2022	Domestic	139	143	468612
ROBERT HULTZ	4/25/1977	Irrigation	139	140	372561
RON JAVAUX	3/26/1991	Domestic	109	112	304429
RUBEN ASUMENDI	8/1/2023	Irrigation	264	500	473407
RYAN GOODSON	1/19/2021	Domestic	93	101	461915
TERRY L MCGHEE	7/1/2021	Domestic	117	140	464960
ZZ CONSTRUCTION	8/9/2022	Domestic	145	145	470819
		Average	133	162	
		Minimum	46	47	
		Maximum	337	500	

Thank you for the opportunity to comment on this proposed well. Please let me know if you have any questions or comments related to this review.

Thanks,

Dennis Owsley

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