

To whom it may concern,

Please enter the following comment into the record regarding SROG's application to drill a gas well on the 320 acre drilling unit spaced and integrated under Idaho OGCC Order Agency Case No. CC-2024-01-002

Several items concern me when considering this application to drill, beyond the obvious question of why any company would be permitted to drill for gas and oil so close to the iconic Payette River – a sensitive wildlife habitat and mainstay for recreationists, not to mention the lifeblood of the agricultural community.

In the spacing application for this tract Fruitland City Administrator Stuart Grimes objected strongly to the proposed spacing unit primarily because it includes the city's one and only wastewater treatment facility and surrounding infrastructure. The city reportedly spent close to \$20M on this critical infrastructure and clearly has serious concerns about the potential for damages from oil and gas drilling near or under the complex network of underground piping, buildings, specialized concrete ditches and other associated infrastructure. In my experience, the city is correct in their assertion that current regulations are inadequate to provide anywhere near the appropriate insurance amounts to cover potential damages, nor do they have any alternatives to treat the entire city's residential, commercial and industrial wastewater in the event things go badly, as far too often happens with this industry. History tells us how these scenarios have played out in other oil and gas producing states; the operators file bankruptcy and bolt, leaving taxpayers to shoulder the costs. It should be absolutely mandatory that SROG modifies their plan to circumvent this water system.

In Pg. 18 of the final spacing Order the Hearing Officer stated that the integration application was not the proper place for Fruitland to raise their concerns. That begs the question - where and when *is* the proper place? Is it a year down the road after the damage is done and the city is forced to use hundreds of thousands of taxpayer dollars to sue the state for putting this entire community at risk? The HO added that "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.***" How does putting a community at dire and avoidable risk of losing their water make efficient and economical sense to anybody???

Finally, on Pg. 16 of SROG's drilling application they include the following paragraph:

Both the Surface and Production Casing weights, grades, & connections will be as shown here, or higher if stronger material is more readily available. This is meant to show the minimum specs that we will utilize for the well. We want to retain the right to utilize a stronger grade, weight, or connection if that is what we decide upon receiving all casing bids from vendors

This text raises concerns given the current increased costs and availability issues of high quality materials for drilling and pipelines due to tariffs and geopolitical tensions. I pray that you will not allow SROG to take shortcuts in their materials and construction methods due to these factors. Please hold them to the latest standards for [API 5CT surface casing](#) as defined by the [11th Edition \(released late 2023\)](#), updated with an [Addendum in May 2025](#), enhancing requirements for performance, materials, and manufacturing, including new high-collapse products, new grade C125, and clarified testing/marketing for better safety, integrity, and environmental protection in oil & gas operations. Thank you.

Shelley Brock
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