

James Thum

From: Sharla Arledge on behalf of Comments
Sent: Monday, April 6, 2026 2:42 PM
To: James Thum; Kayleen Richter
Cc: Kourtney Romine; Jane Kreller
Subject: FW: Miller 1-15 Comment

Categories: Operations & Inspections

From: Mick Thomas <mickthomas.geo@gmail.com>
Sent: Saturday, April 04, 2026 10:18 PM
To: Comments <comments@idl.idaho.gov>
Subject: Miller 1-15 Comment

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April 4, 2026

Idaho Oil and Gas Conservation Commission 300 N. 6th Street, Suite 103 P.O. Box 83720 Boise, Idaho 83720-0050

RE: Matters for Commission Consideration Regarding Application for Permit to Drill: SROG Miller 1-15

To the Commission,

This letter is submitted to formally request that the Commission review and consider the following technical and regulatory points during its evaluation of the SROG Miller 1-15 drilling application for Payette County.

1. Evaluation of Transportation and Infrastructure Logistics:

The application identifies a surface hole location in Section 15, Township 8N, Range 5W, situated approximately 1,201 feet from N. Pennsylvania Ave and 1,181 feet from NW 16th St. As no gathering lines or pipelines are proposed in this filing, the Commission is asked to consider:

- The practical requirements of transporting produced fluids via tanker trucks through the City of Fruitland.

- Whether the identified local access roads are structurally rated for sustained heavy commercial traffic, and the necessity of overweight permits from the Local Highway Jurisdiction for loads exceeding 80,000 pounds.
- The sufficiency of the 2.5% production tax distribution to Payette County in addressing specific localized impacts on transportation infrastructure.
- The interaction between 24-hour production hauling and local municipal ordinances that restrict truck deliveries and related work to daytime hours (7:00 AM to 7:00 PM weekdays).

2. Review of Deferred and Omitted Application Data:

The Commission should take notice of several items currently marked as N/A or TBD, which may require supplemental verification:

- The application lists Bond Type and Number as N/A. The Commission must ensure compliance with Idaho Code section 47-316(1), which mandates the posting of required bonds prior to permit approval.
- The operator has excluded Well Treatment and Pit Construction from this application. The Commission is asked to note that separate applications and approvals will be necessary should these activities become required.
- The placement of centralizers for the surface, intermediate, and production casing strings remains TBD.

3. Verification of Physical Setbacks and Proximities:

I respectfully recommend the Commission verify the following geospatial data provided in the application:

- One exhibit map indicates a 140-foot distance to a property line, while the OGR-101 form reports the nearest distance to a property or lease line as 1,427 feet.
- The drilling unit includes an Idaho Department of Transportation lease, and the site is located approximately 256 feet from a railroad line.
- While a Quarter Mile Radius map is included, the specific distance to the nearest water supply structure and nearest occupied dwellings requires confirmation to ensure compliance with both state and local setback requirements.

4. Noise and Nuisance Mitigation:

Given the well's proximity to residential developments such as Eiffie and River Crest Estates, the Commission is asked to consider:

- The authority of the City of Fruitland to enforce noise and nuisance ordinances for sounds crossing into city limits, particularly during late-night hours (11:00 PM to 7:00 AM).

- The adequacy of proposed sound mitigation measures, such as engine mufflers or sound blankets, to maintain compliance with local police powers and state safety standards.

5. Consistency with Established Spacing and Integration Orders:

The Commission is asked to confirm that this application adheres to the constraints of Final Order CC-2025-OGR-01-002 and Final Order CC-2025-OGR-01-005. While the proposed coordinates appear consistent with the 400-acre unit established for the Harmon Field, the Commission should ensure the directional S curve path maintains all necessary internal setbacks.

Please understand these comments are intended to be unbiased and objective. Any inference otherwise is coincidental.

Respectfully submitted,

Mick Thomas

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South Jordan Utah, 84009