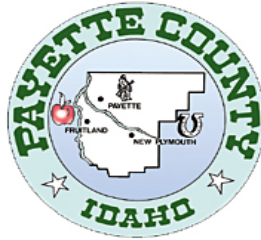


OFFICE OF
PLANNING AND ZONING
FOR PAYETTE COUNTY, IDAHO



Patti S. Nitz
Administrator

Mildred Sheffield
Administrative Assistant

1130 3rd Ave. N. Rm. 107
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pandz@payettecounty.org

April 15, 2026

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

RE: Snake River Oil & Gas Miller #1-15

Dear Mr. Thum,

After reviewing the above application, I have some concerns about this proposed site. I am including a copy of Payette County Code § 8-20-7.C so that you will see the proposed well site does not comply with Payette County's setback requirements. I am also including a letter received from the City of Fruitland that addresses the same concerns.

Additionally, there is no domestic well water testing included with the application as required by Payette County Code § 8-20-8, making the application incomplete for County purposes.

I am respectfully asking the Idaho Department of Lands to not issue the requested permit for Miller #1-15 until these issues are resolved.

Respectfully,

Patti S. Nitz

Patti S. Nitz
Payette County
Planning & Zoning Administrator

att: PCC 8-20-7; PCC 8-20-8

cc: City of Fruitland; Snake River Oil & Gas

8-20-7: SITE DESIGN AND INSTALLATION:

C. Setbacks/Location:

1. Setback distances shall be a minimum of three hundred feet (300') from any existing occupied structure, domestic water well, canal, ditch or the natural high-water mark of surface waters or within fifty feet (50') of a highway, and a minimum of two hundred feet (200') from the property line, unless stated otherwise in a written agreement signed by all affected parties, including adjacent landowners affected by the reduction of the setback.

2. Recognizing that the specific location of equipment and facilities is an integral part of the oil and gas development, and as part of the planning process, operator shall strive to consider the location of its temporary and permanent operations, where prudent and possible, so as to minimize interference with Payette County residents' enjoyment of their property and future county development activities as authorized by the Payette County applicable ordinances.

3. Exception from the standards established in this subsection may be granted by the county upon good cause by the operator that it is not feasible to meet the setback requirements from surface tract property lines and that adequate safeguards have or will be provided to justify the exception.

8-20-8: WATER QUALITY TESTING:

As a condition of permit approval, applicant must provide to county, prior to any drilling activity, documentation of baseline water testing on a minimum of two (2) domestic wells, down gradient, or up gradient if two (2) down gradient wells do not exist, for the protection of public health and safety. The two (2) wells shall be located within a fixed radius of one-fourth (1/4) mile of the well site or as close to the well as possible. If only one domestic well is found within a fixed radius of one-fourth (1/4) mile of the well site, it shall be the only domestic well required for test. Applicant shall send written notification to the county and all landowners, including municipalities and government agencies within one-fourth (1/4) mile of the drill site advising of the intent to drill and providing the results of the baseline water testing. Tests shall be completed for all items listed below:

A. Field parameters:

1. Water temperature.
2. pH.
3. Specific conductivity.

B. Specific conductivity and total dissolved solids.

C. Major ions:

1. Chloride.
2. Fluoride.
3. Sulfate.
4. Nitrate.
5. Silica.
6. Alkalinity.
7. Calcium.
8. Sodium.
9. Potassium.
10. Magnesium.

D. Trace elements:

1. Aluminum.

2. Arsenic.
3. Barium.
4. Boron.
5. Iron.
6. Manganese.
7. Selenium.
8. Uranium.

E. Radiochemical:

1. Gross alpha/gross beta radioactivity, in addition to uranium listed above.

F. Organics:

1. BTEX (benzene, toluene, ethylbenzene, and xylene).
2. Methane; carbon isotopic composition for samples with sufficient methane.

Baseline water testing shall be completed every twenty-four (24) months while the well is in production. Copies of baseline water quality test results shall be provided by the applicant free of charge to owners of the wells tested and to the county within thirty (30) days of receipt of the testing results.

(Ord. 2013-02, 8-5-2013; amd. Ord. 2024-04, 12-23-2024)



City of Fruitland

Area Code 208
Phone 452-4421
FAX 452-7032
www.fruitland.org

200 S. Whitley

P.O. Box 324
FRUITLAND, IDAHO 83619

Patti Nitz, Payette County Planning & Zoning Administrator,

4-9-2026

Dear Patti,

At such time that Snake River Oil & Gas applies to Payette County to obtain a permit to drill a well on the Mary Ann Miller Trust property (Parcel 08N05W159161), the City of Fruitland would respectfully request that you, as the Planning & Zoning Administrator, take the following into consideration prior to issuing any permit.

According to Payette County Code 8-20-7: Site Design and Installation, "Setback distances shall be a minimum of three hundred feet (300') from any existing occupied structure, domestic water well, canal, **ditch**, or the natural high-water mark of surface waters..." "and a minimum of two hundred feet (200') from the property line, unless stated otherwise in a written agreement signed by all affected parties, including adjacent landowners affected by the reduction of the setback.

1. In SROG's application to drill filed with the Idaho Department of Lands, their own map (Exhibit #1) shows a distance of 565' to the Famer's Cooperative Ditch Canal. However, **they failed to show or document an open conveyance ditch that is located only 111' from the surface hole location (well site).** (See attached maps. Exhibit #1 is the map SROG submitted to the Department of Lands with their drilling permit application. Exhibit #2 is a map using their latitude and longitude coordinates to show the distance and location of the open conveyance ditch west of their well surface hole location. Exhibit Map of Miller 1-15 is SROG's surveyor's map that was submitted with their application to IDL.)

This 111' to the ditch is not even half of the 300' setback required by Payette County Code 8-20-7.

2. In addition to the Exhibit 1 map SROG submitted to IDL, they also submitted Exhibit map of Miller 1-15, a map they had 4 Rivers Surveying Inc. prepare. The distances on these two maps that SROG submitted as part of their application to IDL do not match. Exhibit #1 shows the well head being 138' south of Dorsing 08N05W157350 (**well under the 200' from a property line required by Payette County Code 8-20-7**) while Exhibit Map of Miller 1-15 shows the well

head being 135' south of Dorsing Parcel 08N05W157350. **This too is well under the 200' required by Payette County Code 8-20-7.**

3. Similarly, on Exhibit 1 map, they show a distance of 140' to Dorsing Parcel 035400060000F to the west. **(well under the 200' from a property line required by Payette County Code 8-20-7)** while on Exhibit Map of Miller 1-15 they show a distance of 118' to Dorsing Parcel 035400060000F. **This is barely half of the 200' required by Payette County Code 8-20-7. Not only do the measurements not match, none of them meet Payette County Code.**
4. While they were not required to show it on their application to IDL, the City believes that they also do not meet the Payette County 200' setback from the property line of INPR Parcel 08N05W159180.

Payette County Code 8-20-7 also states "Recognizing that the specific location of equipment and facilities is an integral part of the oil and gas development, and as part of the planning process, operator shall strive to consider the location of its temporary and permanent operations, where prudent and possible, so as to minimize interference with Payette County residents' enjoyment of their property and future county development activities as authorized by the Payette County applicable ordinances."

The City of Fruitland has concerns that the drilling and placement of an oil well on Mary Ann Miller Trust parcel 08N05W159161, which is surrounded on three sides by city limits and future city development, will certainly have a negative affect on Payette County resident's enjoyment of their property. The city has already advised concerned residents to direct their concerns and complaints to Payette County as the jurisdiction potentially issuing the permit to drill.

For the aforementioned reasons, the City of Fruitland respectfully requests Payette County Planning & Zoning deny any application to drill on the currently identified well location on Parcel 08N05W159161 due to failure to meet Payette County Code 8-20-7.

Thank you for your consideration.

Kari Peterson, Mayor

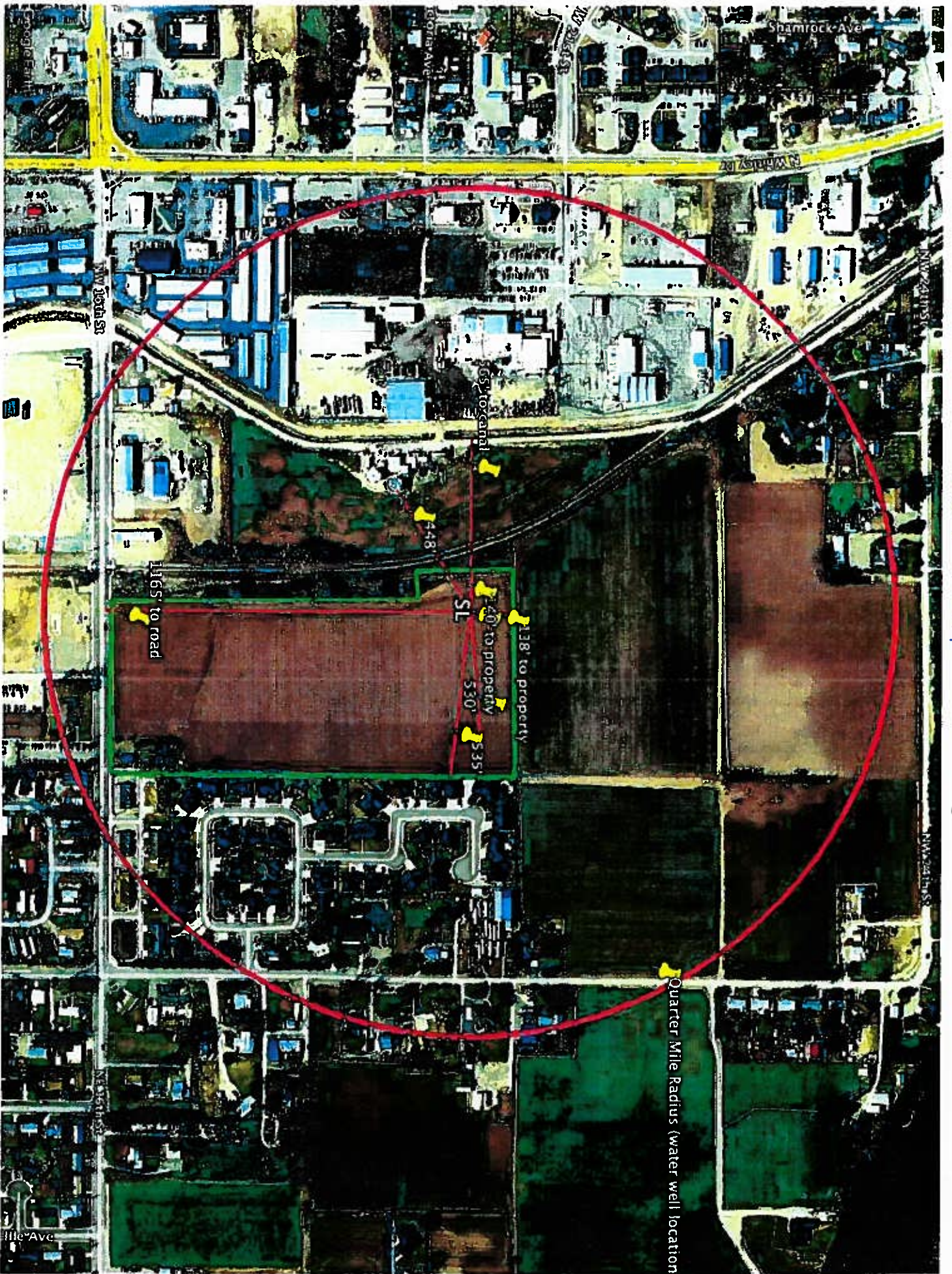


Exhibit #1

Quarter Mile Radius (water well location)

SL

530'

118' to property

1165' to road

448'

65' to canal

Shamrock Ave

W 1st St

W 2nd St

W 3rd St

W 4th St

W 5th St

W 6th St

W 7th St

W 8th St

W 9th St

W 10th St

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Exhibit #2

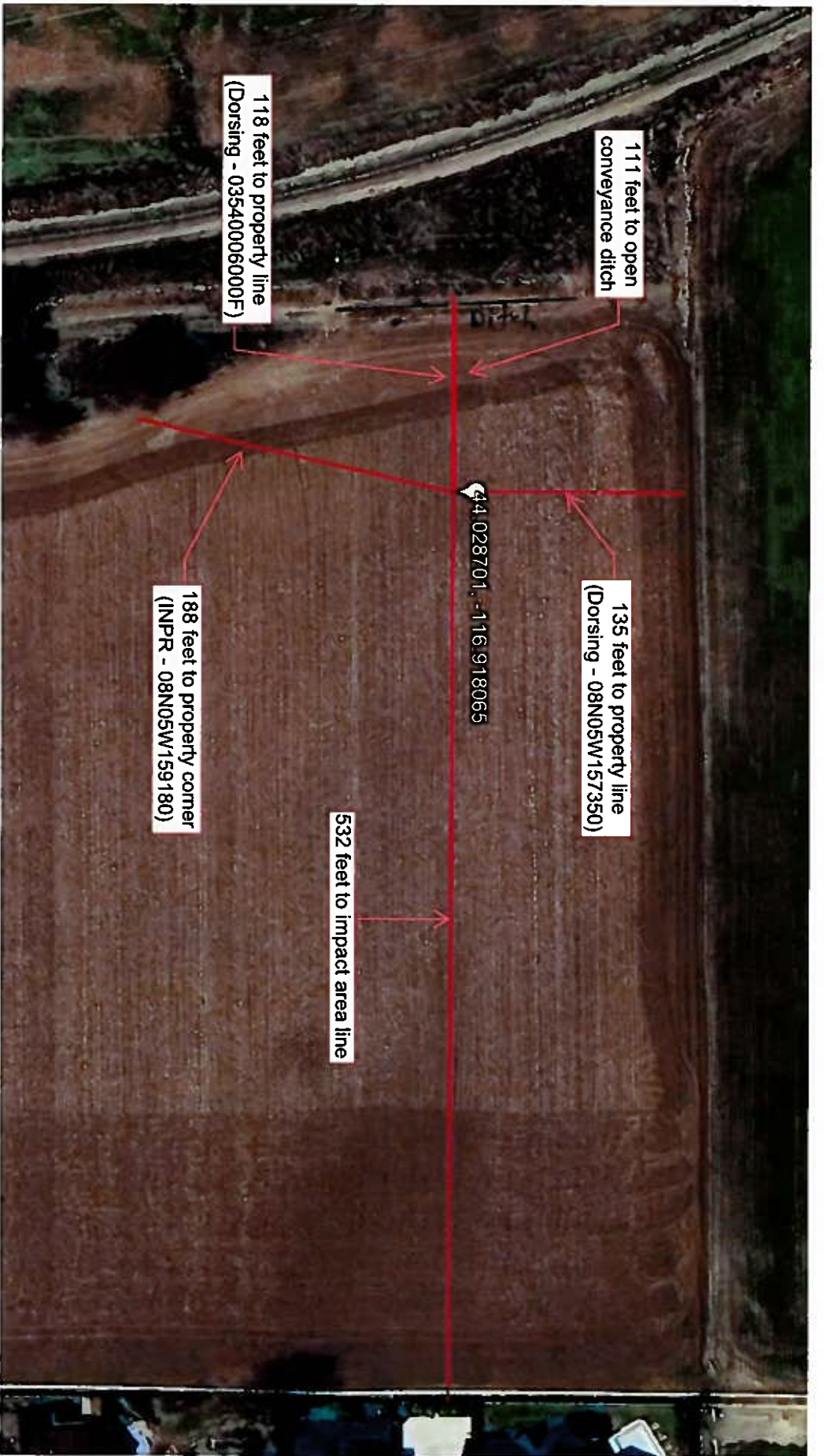
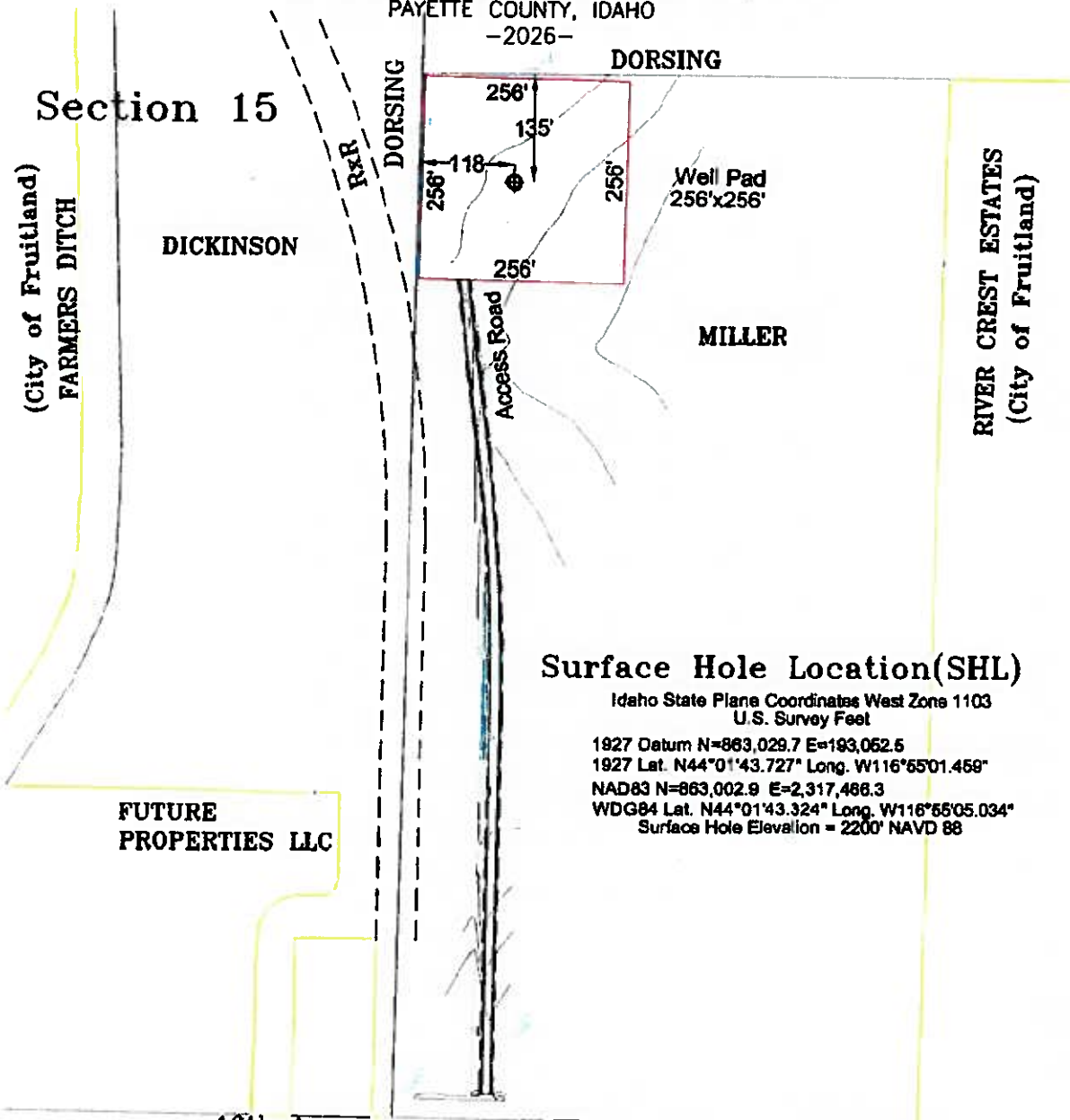


EXHIBIT MAP OF Miller 1-15

LOCATED IN
A PORTION OF THE W1/2 OF THE SE1/4 OF THE SE1/4 OF SECTION 15,
TOWNSHIP 8 NORTH, RANGE 5 WEST, B.M.,
PAYETTE COUNTY, IDAHO
-2026-



Surface Hole Location(SHL)

Idaho State Plane Coordinates West Zone 1103
U.S. Survey Feet

1927 Datum N=863,029.7 E=193,062.6
1927 Lat. N44°01'43.727" Long. W116°55'01.469"
NAD83 N=863,002.9 E=2,317,486.3
WDG84 Lat. N44°01'43.324" Long. W116°55'05.034"
Surface Hole Elevation = 2200' NAVD 88

FUTURE
PROPERTIES LLC

16th Ave.



SCALE: 1"=200'

1310 Shady Lane, EMMETT IDAHO
PHONE: 855-477-6701

