

From: [Stuart Grimes](#)
To: [Elaine Maneck](#); [Scott Zanzig](#); [Filings](#)
Cc: [Kayleen Richter](#); kromine@idl.idaho.gov; [James Thum](#); james@idunionlaw.com; marty@idunionlaw.com; ramblingman3143@gmail.com; sjb@msbtlaw.com; [Mike Christian](#)
Subject: RE: City of Fruitland - Written Objection
Date: Wednesday, December 31, 2025 11:21:35 AM

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Office of Administrative Hearings,

In response to Mr. Christian's Motion to Exclude, The City of Fruitland would like to offer the following comments for consideration:

During the IDL hearing held at Fruitland City Hall on December 17, 2025, Richard Brown and Wade Moore testified (under oath) that they had participated in "Informal Conversations" about a traffic plan to access the proposed parcel they plan on locating the well pad.

They indicated that those informal conversations were with Highway District #1 and that the Highway District had suggested using Highway 95 and NW 16th St. At that point I made a note to check the jurisdiction of Highway District #1 on that particular stretch of road since I was certain that the portion of NW 16th immediately east of Highway 95 to beyond the well-site parcel was City of Fruitland's jurisdiction, not Highway District #1. I verified this that evening after the hearing. The next day, December 18th, I checked with my public works supervisor, Matt Brock, to see if he had any conversations, formal or informal, with Snake River Gas & Oil regarding a traffic plan for the proposed drill site. He confirmed that he had not had any conversations with them whatsoever. That prompted me to look over the maps and spreadsheet that SROG had submitted as part of their integration application to see if they not only errored in having those "Informal conversations" with the wrong agency, but may have also errored in leasing the streets in the spacing unit from the wrong agency. I confirmed this indeed was the case on December 22nd. The 21.374 acres of streets that showed as being willingly leased on their map and spreadsheet were attributed to a lease with Highway District #1 instead of the correct lessee, the City of Fruitland. At this point I started to compile the documents and information to submit to IDL to make them aware of the errors.

In regards to the "Untimely Submission" of our comments, I'll summarize the timeline of events and *what the City of Fruitland was instructed to do by the Department of Lands hearing officer and IDL Program Manager.*

At the conclusion of the evidentiary hearing held at Fruitland City Hall on December 17th, 2025, Hearing Officer Scott Zanzig announced to a packed city council chambers that

the public comment portion of the hearing would be left open for further comments and submittals until December 24th, 2025. After the public comment portion concluded that took place that same day from 5:00PM- 6:00PM, James Thum stopped in the foyer on his way out to thank me for the use of the city council chambers to conduct the public hearing. He also stated that if the City of Fruitland had any other comments or information they would like to submit for consideration, it could be submitted to the email address listed on the Department of Lands website and the deadline would be December 24th.

I called James on December 22nd to confirm where to email the City's additional comments and his response is below.

Stuart,

Thank you for the phone call today regarding the above docket. As of this afternoon the recording of the evidentiary hearing and subsequent public hearing have been posted to youtube: <https://www.youtube.com/watch?v=9ZQ6uABmeBQ>

When submitting your comments to the Hearing Officer, please CC the following legal representatives for this docket:

Office of Administrative Hearings (OAH):

Kayleen Richter – IDL: krichter@idl.idaho.gov

Michael Christian – SROG, applicant: mike@hpk.law

James Piotrowski – Mineral interest objectors: james@idunionlaw.com

If you have additional questions please reach out to me or Kayleen at any time.

Sincerely,

James Thum
Oil & Gas Program Manager
Idaho Department of Lands
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Boise, Idaho 83702
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Mobile: (208) 912-5014
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The Motion to Exclude makes it appear that the City of Fruitland purposefully sat on this information to submit at the last minute, which could not be further from the truth. The additional information was discovered due to comments made by the applicant in

the evidentiary hearing on December 17 , 2025. The Motion to Exclude also mentions that the City should have brought this up when SROG originally attempted to lease the city owned parcels in this spacing unit. **It is of utmost importance to note that when SROG mailed the City of Fruitland their offer to lease City owned parcels, the streets were not included or identified in that lease offer. To this date, the city owned streets have still never been solicited for lease.** It is not the City's responsibility to ensure that an applicant has attempted to lease parcels from the correct, legal owners of said parcels. That responsibility falls solely on the applicant.

It is the City's position that the additional information was submitted, as specifically instructed by the Hearing Officer and IDL Program Manager, to the appropriate parties and well within the December 24th deadline that was established and posted on the DOL's official website.

To conclude, the City finds it concerning that because an error on the part of the applicant was identified and proven with documentation (recorded documents from Payette County) that our submission is being considered for exclusion from consideration. If Mr. Christian's Motion to Exclude is granted, it is effectively sending the message that anything that sheds an unfavorable light on the applicant or their practices can and will be removed from consideration. The City requests the Motion to Exclude be denied and our additional comments and information be taken into consideration by the Department of Lands and entered into the record.

The City of Fruitland appreciates the opportunity to express our opinion on this matter.

Stuart Grimes

City Administrator

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From: Elaine Maneck <Elaine.Maneck@oah.idaho.gov>

Sent: Monday, December 29, 2025 11:42 AM

To: Mike Christian <mike@hpk.law>

Cc: Kayleen Richter <KRichter@idl.idaho.gov>; kromine@idl.idaho.gov; James Thum <jthum@idl.idaho.gov>; Scott Zanzig <Scott.Zanzig@oah.idaho.gov>; james@idunionlaw.com; marty@idunionlaw.com; ramblingman3143@gmail.com; Stuart Grimes <sgrimes@fruitland.org>; sjb@msbtlaw.com

Subject: City of Fruitland - Written Objection

Good morning,

Reference to an objection filed by the City of Fruitland was referenced in Applicant's Motion to Exclude. Could a copy be emailed to me please?

Thank you.



Elaine Maneck | Deputy Clerk

Office of Administrative Hearings | State of Idaho

O: 208-605-4321 W: oah.idaho.gov