

**From:** James Thum  
**To:** ["Michael Christian"](#)  
**Cc:** [Philip Clegg](#); [Mick Thomas](#)  
**Subject:** RE: CPC Mineral  
**Date:** Wednesday, May 30, 2018 01:16:00 PM

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Mike,

Thank you for the additional items and clarification on the application submitted by CPC Mineral for a non-standard drilling unit in Bonneville County. Per Idaho Code § 47-328(3)(a), the department has five business days to notify an applicant if additional information will be required to evaluate the application. An initial review of the application reveals some technical deficiencies that the department feels will need to be addressed before we can complete our technical evaluation.

1. Within the boundaries of the proposed 40-acre unit, CPC drilled the Federal 20-3 well (USWN 11-019-20014) during October and November of 2017. This well was plugged and abandoned after encountering no indications of hydrocarbons. The technical evaluation of the prospect area submitted with the request entitled "Exploration Potential of Caribou Prospect, Grays Lake Area Bonneville County, Idaho" by Keller Consulting Corp., dated October 29, 2015, contains no updated information or interpretations incorporating the geologic findings of the existing 20-3 well. None of the maps, interpretations, seismic profiles nor time structure maps depict the location of this well. None of the displays depict the location of the requested non-standard drilling unit. Please provide the requested technical information to the department.
- 2.
3. Page 2 of the cover letter submitted to the department, dated May 29, 2018 (page 2 is dated May 29, 2017, as is page 3) contains three "facts" to support the application. None of the facts address the existing 20-3 well within the proposed drilling unit. The department requests that the applicant re-address each item in light of the technical evaluation of the existing 20-3 well. The applicants' geologic interpretation of the findings from the 20-3 are pertinent to the applicants' request for a non-standard unit that has already been tested.

Please submit the requested information to the department no later than **Friday, June 8, 2018**. This request does not limit the department's ability to request additional technical information by the June 5, 2018 deadline.

If you have any questions regarding this request, please don't hesitate to contact me at your earliest convenience.

Sincerely,

**James Thum**

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**From:** Michael Christian <mchristian@mch-lawyer.com>

**Sent:** Wednesday, May 30, 2018 9:27 AM

**To:** James Thum <jthum@idl.idaho.gov>

**Cc:** Philip Clegg <pmclegg@pnclegg.com>

**Subject:** CPC Mineral

James:

Per my message to you yesterday, there was a typographical error on the first page of the application submitted for CPC Mineral yesterday. A corrected first page is attached to this email. My apologies for the error.

In addition:

1. To clarify the application, while it may be discernible from the illustration attached to the application, CPC Mineral intends to drill in the proposed unit from the existing surface location constructed for the Federal #20-3 well. The proposed unit would eliminate the need to construct a new location elsewhere and thus reduce the surface disturbance that would otherwise occur.
2. CPC Mineral requests that, should no objection to the application be timely filed with the Department, the application be decided administratively and without a hearing, pursuant to Idaho Code 47-328(3)(d).

If you have any questions about the above, please don't hesitate to call me.

Thanks,

Mike

**Michael Christian**

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