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## Idaho Conservation League

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10/30/2015

Oil and Gas Program  
Boise Staff Office  
300 N. 6<sup>th</sup> St., Suite 103  
Boise, ID 83702

Submitted via email: [comments@idl.idaho.gov](mailto:comments@idl.idaho.gov)

### **RE: Idaho Conservation League comments on Alta Mesa's application to drill the ML Investments 2-3 oil and gas well**

To Whom It May Concern;

Thank you for the opportunity to comment on Alta Mesa's application to drill the ML Investments 2-3 oil and gas well near Payette, ID. Since 1973, the Idaho Conservation League has been Idaho's leading voice for clean water, clean air and wilderness—values that are the foundation for Idaho's extraordinary quality of life. The Idaho Conservation League works to protect these values through public education, outreach, advocacy and policy development. As Idaho's largest state-based conservation organization, we represent over 25,000 supporters, including several members who live in the project area, whom have a deep personal interest in protecting Idaho's groundwater.

#### Incomplete Application

Upon review of the application to drill the well ML Investments 2-3, we believe that the applicant has failed to provide information required by the Department. Namely, the survey plats or maps required to accompany the application do not disclose “both surface and bottomhole locations” and “distances of the proposed well...from the nearest oil or gas wells.” The application includes a numeric distance between the proposed well and nearest drilling site, however this information is not presented in any figures. This information is required pursuant to Idaho's application for a permit to drill.

The absence of this critical information precludes us from adequately reviewing this application. We ask that Alta Mesa provide this information before the application can be thoroughly reviewed.

#### Seismic Impacts to Mechanical Integrity

The application includes reference to a subsurface map showing a fault on site, however it appears that this map is not publicly available. Regardless, we believe the presence of a fault on site should trigger additional monitoring provisions during drilling operations.

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It is unclear if this is an active fault, and if so, the potential slippage rate of the fault. The activity of this fault could have direct implications on the mechanical integrity of the system, with even minor faulting potentially generating a compromised seal. We recognize that we raise these concerns without knowledge of fault location, orientation, and the current state of stress in the subsurface. However, given that the presence of this fault is cited as reasoning for a change in well location, we believe these are legitimate concerns.

We ask the Idaho Department of Lands to include special provisions to this permit requiring monitoring and reporting of seismic activity during operational times. If seismic activity is recorded, the mechanical integrity of the well should be tested pursuant to the requirements defined in *IDAPA 20.07.02.320.05*.

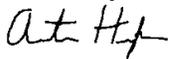
#### Use of Sump Trench

Alta Mesa proposes to use a 2' deep trench on downhill sides of the site to act as a sump to collect rain and wash water for controlled release or appropriate disposal. It is unclear if this trench will be lined in order to prevent infiltration and the retention time prior to release or disposal. Additionally, the application does not specify where water during controlled releases will be directed.

We seek clarification from Alta Mesa on whether or not the ditch will be lined, what monitoring protocols and water quality testing will be utilized prior to release and to specify the location that release water will be directed to.

Please do not hesitate to contact me at 208-345-6933 ext. 23 or [ahopkins@idahoconservation.org](mailto:ahopkins@idahoconservation.org) if you have any questions regarding our comments or if we can provide you with any additional information on this matter.

Sincerely,



Austin Hopkins  
Conservation Assistant