



State of Idaho

DEPARTMENT OF WATER RESOURCES

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Phone: (208) 287-4800 • Fax: (208) 287-6700 • Website: www.idwr.idaho.gov

C.L. "BUTCH" OTTER
Governor

GARY SPACKMAN
Director

November 3, 2013

Eric Wilson
Bureau Chief/ Resource Protection and Assistance
Idaho Department of Lands
300 N 6th Street, Suite 103
Boise, ID 83702

RE: ML Investments Well 2-3

Mr. Wilson,

Thank you for providing Idaho Department of Water Resources (IDWR) an opportunity to review and comment on the application to drill ML Investments 2-3 well submitted by Alta Mesa Services, LP. IDWR staff reviewed the applications and drilling plan for the proposed well and submits the following comments for your consideration.

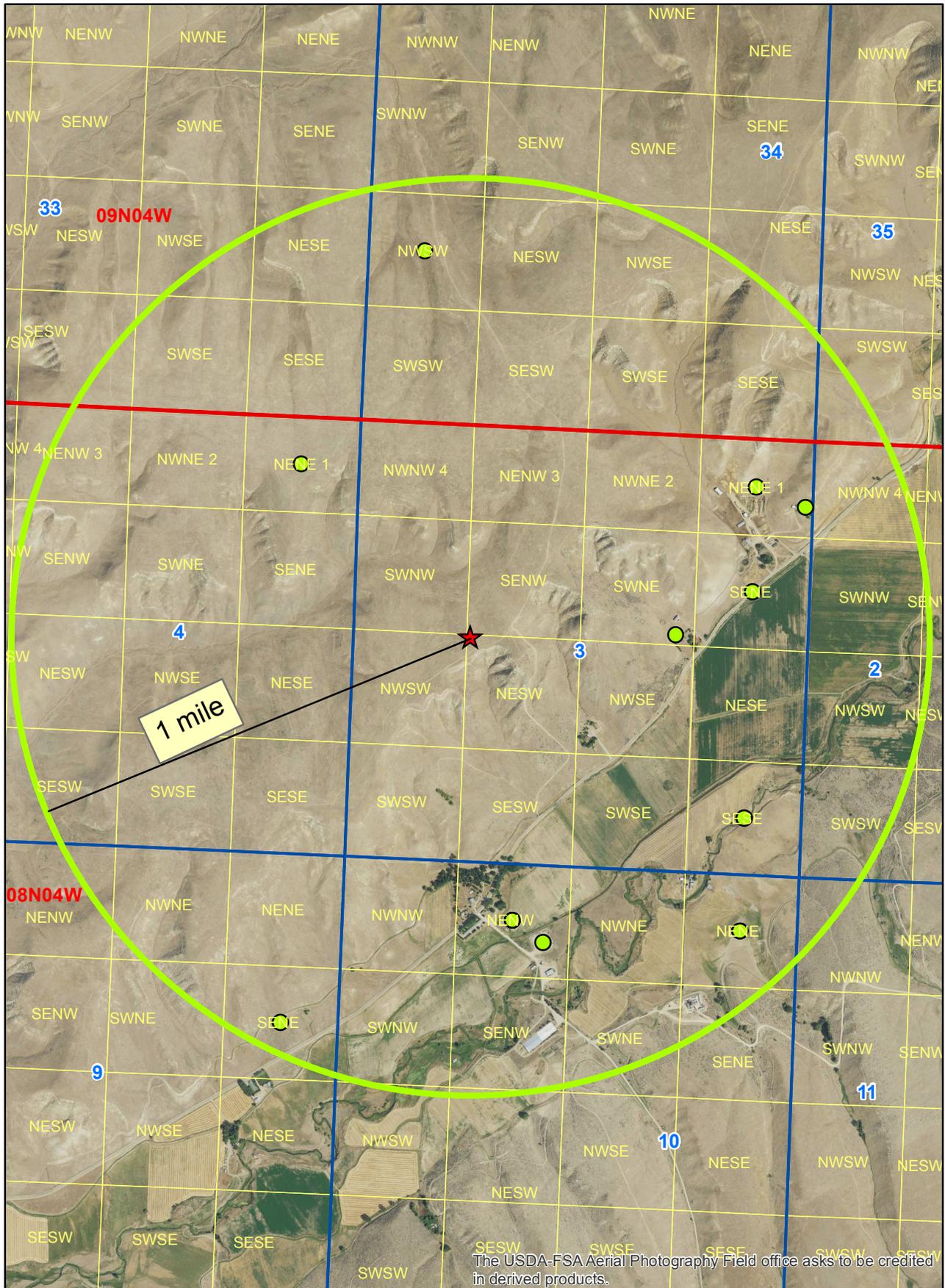
1. IDAPA 37.03.09.010.66.c.ii states "holes drilled for oil and gas exploration which are subject to the requirements of Section 47-320, Idaho Code" are not considered a well. Therefore the proposed boring is not subject to permitting requirements of IDAPA 37.03.09.
2. IDAPA 37.03.09.045.03 states that excluded borings that are not considered wells still need to comply with the minimum standards for modification, construction, or decommissioning. The proposed boring satisfies the minimum construction standards, however if the boring is not produced for oil or gas, it cannot be used for any other purpose and must also be decommissioned in accordance with IDAPA 037.03.09.025.16.
3. Idaho does not have authority from the Environmental Protection Agency to permit Class II injection wells to inject brines and other fluids associated with oil and gas production wells. The applicant should be made aware of this as it may have implications on their production plans.
4. If groundwater is to be pumped to support the drilling activities the applicant should contact a water right agent at IDWR to discuss obtaining a temporary water right.
5. IDWR records indicate there are 14 ground water wells within a one mile radius of the proposed ML Investments 2-3 well (see attached map and well table). These water wells range in depth from 25 to 307 feet, considerably shallower than the proposed gas well. Constructing the gas well as planned with casing and annular seals to total depth of 5,000 feet should provide adequate protection of the local ground water resources.

Sincerely;

A handwritten signature in blue ink that reads "Chad F. Hersley". The signature is written in a cursive, flowing style.

Chad F. Hersley, P.G.
Technical Hydrogeologist
Ground Water Protection Section

Water wells within 1 mile radius of ML Investments well 2-3



The USDA-FSA Aerial Photography Field office asks to be credited in derived products.

- ★ Proposed ML Investments well 2-3
- Existing water wells within 1 mile radius of proposed gas well 2-3

WellID	MetaTagNu	Owner	Constructi	WellUse	Tow Ran	Section	QCQCQu	WellAddress	Production	StaticWate	CasingDiam	CasingDept	TotalDepth	
289347	D0012334	GEORGE STEPHENS	12/10/1999	Domestic-Single Residence	08N	04W	3	NE NE 4950 LITTLE WILLO'		60	84	8	195	210
290564		ANN GLOVER	5/12/1997		08N	04W	3	NE SE SE 4750 LITTLE WILLO'		20	89	6	139	185
292325		TROY DICKARD	11/23/1992		08N	04W	4	NE NE 815 HOLLY LN		22	8	6	22	25
293017		RALPH CRAWFORD	11/5/1992		08N	04W	3	SE NE 4892 LITTLE WILLO'		100	78	6	98	240
293534		MRS JOHN HANSEN	5/21/1989		08N	04W	10	NE NE		12	15	6	187	187
339013	D0015765	DONALD J SIMPLOT	10/17/2000	Domestic-Single Residence	09N	04W	34	NW SW LITTLE WILLOW		30	240	6	307	307
346482		DILLON L WILSON	7/8/1980		08N	04W	3	SE SE		0	91	0	0	185
377199		ALBERT MITCHELL	11/18/1964		08N	04W	3	SE SW NE		0	80	0	0	183
377306		C H NELSON	12/31/9999		08N	04W	10	NE NW		8	19	0	0	37
387880		PAYETTE FARMS CO	4/8/1966		08N	04W	10	NE NW		0	17	0	0	71
388857		PETE ACAITUREI	3/9/1971		08N	04W	9	SE NE		15	20	0	0	215
390171		ALBERT MITCHELL	4/4/1985		08N	04W	3	NE NE		50	157	0	0	205
402757		C H NELSON	11/4/1953		08N	04W	10	NE NW		0	0	0	0	66
440252	D0068835	GLOBAL CATHODIC PRO	2/6/2015	Cathodic Protection	08N	04W	10	NE NW OFF LITTLE WILLOW		0	0	8	0	200

WellDocs

<http://www.idwr.idaho.gov/apps/appsWell/RelatedDocs.asp?WellID=289347>

<http://www.idwr.idaho.gov/apps/appsWell/RelatedDocs.asp?WellID=290564>

<http://www.idwr.idaho.gov/apps/appsWell/RelatedDocs.asp?WellID=292325>

<http://www.idwr.idaho.gov/apps/appsWell/RelatedDocs.asp?WellID=293017>

<http://www.idwr.idaho.gov/apps/appsWell/RelatedDocs.asp?WellID=293534>

<http://www.idwr.idaho.gov/apps/appsWell/RelatedDocs.asp?WellID=339013>

<http://www.idwr.idaho.gov/apps/appsWell/RelatedDocs.asp?WellID=346482>

<http://www.idwr.idaho.gov/apps/appsWell/RelatedDocs.asp?WellID=377199>

<http://www.idwr.idaho.gov/apps/appsWell/RelatedDocs.asp?WellID=377306>

<http://www.idwr.idaho.gov/apps/appsWell/RelatedDocs.asp?WellID=387880>

<http://www.idwr.idaho.gov/apps/appsWell/RelatedDocs.asp?WellID=388857>

<http://www.idwr.idaho.gov/apps/appsWell/RelatedDocs.asp?WellID=390171>

<http://www.idwr.idaho.gov/apps/appsWell/RelatedDocs.asp?WellID=402757>

<http://www.idwr.idaho.gov/apps/appsWell/RelatedDocs.asp?WellID=440252>