

Idaho Department of Lands  
300 N. 6th Street,  
Suite 103  
P.O. Box 83720  
Boise, ID 83720  
October 14, 2016

DEPT. OF LANDS  
2016 OCT 28 AM 8:36  
BOISE, IDAHO

RE: Directional Application Federal 20-3 Proposed Oil Well, Section 20, T3S, R43E, Boise Meridian

To whom it may concern:

I wish to bring to light some of my concerns with CPC Mineral's application to drill an Oil Well in Section 20, T3S, R43E, Boise Meridian. My principle concerns are:

- The proposed well is a diagonal drill with the point of extraction located under property owned by EP Ranch Trust. The well will be drilled through, and into, Geothermal water rights and water rights owned by EP Ranch Trust. The Oil and Gas Conservation Committee's mission statement includes protection of correlative rights and groundwater. This well permit should not be issued until the Oil and Gas Conservation Committee can guarantee that EP Ranch Trust's Geothermal water rights and water rights will not be effected.
- CPC Mineral will be using a closed loop system which will make it impossible to not use or effect EP Ranch Trusts' sub-surface water rights.
- CPC Mineral's last attempt to drill a well resulted in multiple issues of contamination. CPC Mineral's assets are low and protected by their LLC status. CPC Mineral has only posted \$50,000 in bond to protect activity on three well permits. If CPC Mineral repeats their past performance on the new wells, the cleanup could climb to a multimillion dollar level. I do not understand how the Oil and Gas Conservation Commission would be willing to put the State of Idaho in this position.

I ask that the State of Idaho Oil and Gas Conservation Commission reject CPC Mineral's application to drill a directional oil well in Section 20, T3S, R43E, Boise Meridian.

Thank You,

Randy L. Gardner  
Executor  
EP Ranch Trust