

**From:** [Hersley, Chad](#)  
**To:** [Kourtney Romine](#)  
**Cc:** [James Thum](#); [Gary Billman](#)  
**Subject:** RE: Application for Directional Deviation-Federal #20-3  
**Date:** Tuesday, November 01, 2016 08:59:44 AM  
**Attachments:** [CPC Minerlas\\_2016.pdf](#)

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Kourtney/James

I have reviewed the application for directional deviation for well Federal 20-3. Although the proposed well will have a directionally drilled section the well completion plan suggests the well is to be completed with casing and annular seals similar to the originally planned vertical well. I have no comments in addition to those provided to you in letter dated September 15, 2016 (attached for reference).

Chad. F. Hersley, P.G.  
Technical Hydrogeologist  
Idaho Department of Water Resources  
Ground Water Protection Section  
208-287-4930

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**From:** Kourtney Romine [mailto:kromine@idl.idaho.gov]  
**Sent:** Thursday, October 27, 2016 4:26 PM  
**To:** Hersley, Chad  
**Cc:** James Thum; Gary Billman  
**Subject:** Application for Directional Deviation-Federal #20-3

Mr. Hersley,

Idaho Department of Lands received an Application for Directional Deviation for proposed well Federal #20-3 from CPC Mineral, LLC in Bonneville County. We are emailing this information to IDWR as required by Idaho Code § 47-320(1)(c).

Attached you will find:

- Letter from Oil and Gas Program Manager James Thum
- Redacted Application
- Unredacted Application

You will also be receiving a hard copy via certified mail.

If you have any questions, please don't hesitate to email me.

Thank you,

**Kourtney Romine**

**Administrative Assistant-RPA**  
**Idaho Department of Lands**  
[\*\*kromine@idl.idaho.gov\*\*](mailto:kromine@idl.idaho.gov)



State of Idaho

**DEPARTMENT OF WATER RESOURCES**

322 East Front Street • P.O. Box 83720 • Boise, Idaho 83720-0098

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

C.L. "BUTCH" OTTER  
Governor

GARY SPACKMAN  
Director

September 15, 2016

James Thum  
Oil and Gas Program Manager  
Idaho Department of Lands  
300 N 6th Street, Suite 103  
Boise, ID 83702

RE: CPC Mineral wells Federal #18-2 and Federal #20-3

Mr. Thum,

Thank you for providing Idaho Department of Water Resources (IDWR) an opportunity to review and comment on the application to drill CPC Mineral wells Federal #18-2 and Federal #20-3. IDWR staff reviewed the application and drilling plan for the proposed wells and submits the following comments for your consideration.

1. IDWR records indicate there are five ground water wells within a one mile radius of the proposed wells (see attached map and well table). Ranging from 70 to 260 feet deep, these wells are considerably shallower than the proposed oil wells.
2. Casing and cementing program for the proposed wells indicate surface casing will be installed to a depth of 2,000 feet with the annular space cemented from the bottom up to land surface. Production casing will be cemented to within 1,000 feet of land surface providing a 1,000 overlap with the surface casing. If the wells are constructed in accordance with the plan, ground water and geothermal resources encountered in the well bore should be adequately protected.
3. 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 borings are not subject to permitting requirements of IDAPA 37.03.09.
4. 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. If the borings are not produced for oil or gas, they cannot be used for any other purpose and must be decommissioned in accordance with IDAPA 037.03.09.025.16.
5. 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.
6. The applicant should contact a water right agent at IDWR to discuss obtaining a temporary water right if water is needed to support the drilling activities.

Sincerely;

A handwritten signature in blue ink that reads "Chad F. Hersley".

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