



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

C.L. "BUTCH" OTTER
Governor

GARY SPACKMAN
Director

November 20, 2015

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

RE: State 1-16 Well

Mr. Wilson,

Thank you for providing Idaho Department of Water Resources (IDWR) an opportunity to review and comment on the application to drill Big Willow Properties well State 1-16, 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 5 ground water wells within a one mile radius of the proposed State 1-16 well (see attached map and well table). These water wells range in depth from 30 to 655 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".

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

Big Willow, State 1-16

Proposed Gas Well State 1-16, Big Willow Properties, November 2015



● Existing water wells within 1 mile radius of State 1-16. Map symbol located in center of 1/4 1/4 represents all wells in 40 acre parcel.

★ Proposed Big Willow Properties well State 1-16

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IDAHO DEPARTMENT OF LANDS
DIRECTOR'S OFFICE
300 N 6th Street Suite 103
PO Box 83720
Boise ID 83720-0050
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IDAHO OIL AND GAS
CONSERVATION COMMISSION
Chris Beck, Chairman
Margaret Chipman, Vice-Chairman
Sid Cellan
James Classen
Ken Smith

November 17, 2015

RECEIVED

NOV 19 2015

DEPARTMENT OF
WATER RESOURCES

Chad F. Hersley
Underground Injection Control Program
Idaho Department of Water Resources
322 East Front Street
Boise, ID 83702

Subject: Application for Permit to Drill Review-State 1-16 (Big Willow Properties LLLC)

Dear Mr. Hersley,

Enclosed are two copies of an Application for Permit to Drill for State 1-16 (Big Willow Properties LLLC) in Payette County. This application is being provided as required by Idaho Code § 47-320(1). Under that statute, IDWR has 15 days from the date it receives the application to recommend conditions it believes necessary to protect fresh water supplies.

You may email any recommended condition and comments to Kourtney Romine, Administrative Assistant, at kromine@idl.idaho.gov.

IDL has provided two copies to you because IDL has determined that portions of this application are exempt from public disclosure under the Idaho Public Records Law. We have provided an unredacted copy for your review. We have also provided a redacted copy to show you the information IDL has determined is exempt from public disclosure. Although the application is marked confidential, IDL determined that only the following parts of the application are exempt from public disclosure under Idaho Code § 74-107(1) and Idaho Code § 74-108(1) and (2):

- Geologic information on page 4 of the Permit Supplement

If you have any questions, please don't hesitate to contact me at 208-334-0261 or ewilson@idl.idaho.gov. Thank you in advance for your time and attention in this matter.

A hard copy will be provided via mail. Please let me know of any comments by Wednesday, December 2, 2015.

Regards,



Eric Wilson
Bureau Chief
Resource Protection and Assistance

WellID	PermitID	Owner	DrillingCo	Constructi	CountyName	Township	Range	Section	QQ	Quarter	Production	StaticWate	TotalDepth
358928	787876	JEFFERY NOVAC	SOS WELL DRILLING & PUMP CO INC		GEM	08N	03W	15	SE	NW	15	25	60
371960	801046	J R SIMPLOT CO	PETE COPE DRILLIN	4/8/1976	PAYETTE	08N	03W	10	SE	NW	0	0	235
371962	801048	J R SIMPLOT CO	PETE COPE DRILLIN	4/13/1976	PAYETTE	08N	03W	10	SE	NW	0	0	220
371963	801049	PAYETTE FARMS CC	PETE COPE DRILLIN	4/22/1976	PAYETTE	08N	03W	10	SE	NW	0	0	655
371964	801050	J R SIMPLOT CO	PETE COPE DRILLIN	4/23/1976	PAYETTE	08N	03W	10	SE	NW	0	0	30

WellDocs

<http://www.idwr.idaho.gov/apps/appsWell/RelatedDocs.asp?WellID=358928>

<http://www.idwr.idaho.gov/apps/appsWell/RelatedDocs.asp?WellID=371960>

<http://www.idwr.idaho.gov/apps/appsWell/RelatedDocs.asp?WellID=371962>

<http://www.idwr.idaho.gov/apps/appsWell/RelatedDocs.asp?WellID=371963>

<http://www.idwr.idaho.gov/apps/appsWell/RelatedDocs.asp?WellID=371964>