
From: Jeanine Vany <jeanine.vany@eavor.com>

Sent: Friday, April 19, 2024 4:57 PM

To: Rulemaking <rulemaking@idl.idaho.gov>; Mike Murphy <mmurphy@idl.idaho.gov>

Cc: Corporate Affairs <corporate.affairs@eavor.com>; Peter Bauman <peter.bauman@eavor.com>;
Bailey Schwarz <bailey.schwarz@eavor.com>; Jason Rakochy <jason.rakochy@eavor.com>

Subject: . Eavor comments on draft rules governing geothermal leasing on Idaho State Lands

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Dear Mike,

Please find attached Eavor's comments on the draft rules for geothermal leasing on Idaho State Lands.

Kind regards,
Jeanine

Jeanine Vany, P. Geo
Executive Vice President, Corporate Affairs
M 403-465-4761

th

Suite 1100, 214-11 Ave SW, Calgary, AB



www.eavor.com



SUBMITTED ELECTRONICALLY

April 19, 2024

Submitted via email to rulemaking@idl.idaho.gov; mmurphy@idl.idaho.gov

Subject: Comments on draft rules governing geothermal leasing on Idaho State Lands

Responding Entity: Eavor Inc.

Respondent Contact: Jeanine Vany, EVP Corporate Affairs, jeanine.vany@eavor.com

Dear Mr. Murphy:

We appreciated the opportunity to participate in the public meeting on April 10th, 2024 and respond to the draft rules governing geothermal leasing on Idaho State Lands and applaud your proactive efforts to attract sustainable and responsible deep geothermal development in a technology agnostic way in Idaho.

The draft rules appear to be specifically focused on the development of hydrothermal resources based on the geothermal resource and completion techniques definition. We urge the department to consider the next generation geothermal technologies currently under development and to consider the implications on resource definition, completion, production and testing. The Department of Energy's most recent Next Generation Geothermal Pathway to Commercialization report¹ outlines the tremendous potential of this resource across the United States and highlights key non-technical barriers that can be improved, such as permitting and regulation.

Eavor welcomes any further opportunity to participate in stakeholder engagement as the Idaho State Lands prepares for the implementation of geothermal leasing regulation and is pleased to present our unique technology to the IDWR. The Eavor-LoopTM technology has virtually no ongoing water use, has 100% carbon free operations and a very small surface footprint.

Please reach out anytime with questions on our technology, I may be reached at the email above or by phone at 403-465-4761.

Kind regards,

A handwritten signature in black ink that reads "J. Vany".

Jeanine Vany, P. Geo
EVP Corporate Affairs, Eavor
www.eavor.com

¹ [Next-Generation Geothermal Power - Pathways to Commercial Liftoff \(energy.gov\)](https://www.energy.gov/next-generation-geothermal-power-pathways-to-commercial-liftoff)

Comments

010 Definitions

03. Suggest adding an exploration definition that includes the use of drilling rigs.

04. Completion: next generation geothermal technologies will simultaneously complete wells and continue drilling at the same time. Therefore, it makes sense to remove the statement on rig removal from site to consideration geothermal wells completed.

07. Direct use: consider adding a deep direct use definition or remove industrial applications from the existing definition.

09. Field: next generation geothermal technologies do not require the use of fractured aquifers or porous or permeable zones. A field definition might include the presence of hot dry rock.

10. Geothermal Resources: next generation geothermal technologies such as advanced geothermal systems and enhanced geothermal systems do not require aquifers to produce heat from the earth into utility scale heat and power projects. Therefore, to ensure the longevity of the geothermal resource definition as technology advances a definition of geothermal should not include the term aquifer. For best practices on defining geothermal resources, please refer to NREL's 2023 report on Topics and Considerations for Developing State Geothermal Regulations.²

055. Development and Production under the lease

01. Diligent development of lease and production: strike geothermal fluids and replace with geothermal resource

060. Exploration and operation records, confidentiality.

01. Drilling records: Eavor recommends that drilling records be turned over to the IDWR and be accessible to industry through a government portal.

² <https://www.nrel.gov/docs/fy23osti/86985.pdf>