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Sent via email and attachment

Tom Schultz, Director
Bobby Johnson, Oil and Gas Program Manager
Brandon Lamb, Resource Protection and Assistance Bureau Chief
Idaho Department of Lands
IDL Director’s Office
300 North Sixth Street, Suite 103
P.O. Box 83720
Boise, ID 83720-0050
comments@idl.idaho.gov
brjohnson@idl.idaho.gov
blamb@idl.idaho.gov

Comments on the Alta Mesa Services Applications to Drill
the ML Investments 1-3 and 1-11 and Kauffman 1-9 and 1-34 Wells

Mr. Schultz, Mr. Johnson, Mr. Lamb, and IDL staff,

On behalf of over 2400 members, friends, and allies of Wild Idaho Rising Tide (WIRT), I respectfully offer and request inclusion in the public record of these comments concerning the applications submitted to the Idaho Department of Lands (IDL) by Alta Mesa Services (AMS), requesting permits to drill the ML Investments 1-3, ML Investments 1-11, Kauffman 1-9, and Kauffman 1-34 wells, the most recently proposed natural gas or oil wells in Payette County, Idaho [1-4]. We incorporate into this official letter of opposition to these proposed drilling activities the concerns, remarks, and linked citations enclosed in previous WIRT comments addressing Alta Mesa Services applications to develop the Smoke Ranch 1-21 and ML Investments 2-10 wells and the Trendwell West application to drill the Smith 1-10 well [5-7].

Apparent in all four drilling permit applications that disclose the “approximate date work will start” as either June 15 or June 20, 2014, neither IDL nor AMS and the companies that it contracts seem amenable to accepting, much less considering and acting upon, public comments that are due after the work start dates, on June 21 and 27. Why has this state agency allowed such a rushed drilling schedule and burdened the public with examining and offering feedback on these four applications within a concurrent, too-brief time frame? IDL inexplicably dismissed prior WIRT comments documenting public concerns about the proposed drilling plans’ violations of Idaho code, despite their relevance to the applications and IDL’s permitting
decision processes. We accordingly anticipate stronger IDL communication and rejected and/or revised Alta Mesa Services drilling applications for these wells, reopened to public scrutiny and input, in response to the information set forth here.

WIRT activists object to permitting, drilling, and potential hydraulic fracturing (“fracking”) or acidizing of the proposed Alta Mesa Services ML Investments 1-3 and 1-11 and Kauffman 1-9 and 1-34 wells, due to the potential impacts of the wells and their development on human and environmental health and safety and because of the inadequacy and incompleteness of AMS application materials submitted for public review. We are concerned that AMS drilling through subsurface shale, depicted in previous applications but noticeably missing in these four documents, would require utilization of fracking or other well treatments in close proximity to Little Willow Creek and surrounding water courses and wetlands. Even without fracking, the majority of water contamination problems arising from natural gas and oil drilling across the United States have implicated improper construction and aging of well casings. Industry studies show that five to seven percent of all new oil and gas wells leak and that, as wells deteriorate over time, 30 to 50 percent fail mechanical integrity tests. Ground and surface water poisoning can carelessly or intentionally occur from the fluids that result as a byproduct of drilling: The deeper the well, the more radioactive the produced material. In all four cases discussed here, AMS is drilling wildcat wells, targeting reservoirs at depths between 5,500 feet and 5,800 feet respectively east and west of Little Willow Road.

Permitting and subsequent drilling of the four proposed wells could result in significant impacts on fresh water supplies, as prohibited by section 50 of IDAPA 20.07.02 Rules Governing Oil and Gas Conservation in the State of Idaho, and thus would require IDL denial of drilling permit issuance for these four AMS applications. Despite their outlined precautions, entitled Site Preparation and explaining limitations on well and well pad discharges under normal operating conditions, no description appears in the applications stating how well operators will handle accidental or incidental releases of polluting and explosive fluids or emissions that could contaminate the surrounding environment and inhabitants. Such mishaps and associated hazards could significantly impact the value, insurability, and salability of private property, especially existing residential dwellings and domestic water wells, near or overlying the subsurface mineral holdings of possibly separate ownership accessed by these wells. Even in states long ravaged by oil and gas industry snafus, like Pennsylvania and Colorado, responsible local and state agencies have approved minimum setback distances of 1000 feet between wells and these crucial private structures. These four applications do not even mention these structures or accompanying considerations.

With the stated storage and utilization at these four proposed wells of the usual slurry of volatile and toxic chemical substances constituting most drilling muds, state rules and laws governing oil and gas development should include stipulations that mandate baseline sampling and testing of nearby surface and ground water and water wells most vulnerable to contamination by oil and gas extraction activities, before any oil and gas drilling occurs, not just prior to well treatments. Although only slightly sufficient and protective Payette County ordinances require such water testing of two adjacent wells, these applications lack descriptions of these imperative procedures so critical to necessary defense of the health and safety of Idahoans and their water and
environmental resources upon which they rely for long-standing economic endeavors, such as agricultural production.

Most troublesome, if not eventually legally undermining of any well spacing agreements with the state of Idaho, is the distance between and among these four proposed wells and previously drilled wells within just a few miles. In eight adjacent, mile-square sections of land on both sides of Little Willow Road, Alta Mesa Services plans to increase the number of abandoned, pending, or mostly shut-in gas wells awaiting pipeline connections from five (DJS Properties 1-13, 1-14, and 1-15 and ML Investments 1-10 and 2-10) to nine, representing more than half of the oil and gas wells drilled since 2009 in Payette and Canyon Counties. Backed only by questionable financial resources and leased and drill-permitted by IDL at ridiculously low rates, so many crowded and expensive, exploratory forays into the deeper Willow gas field in southwestern Idaho reveal its marginal productivity. Geologists have stated that the target area holds very little oil and gas resources, obvious in the close proximity of wells that could not only rupture the integrity of underground water and methane reservoirs but that could also require toxic well stimulation techniques to maximize flows from small hydrocarbon deposits. Moreover, such obviously meager oil and natural gas resources in Idaho, previously bypassed by industry before current extreme energy extraction technologies like fracking emerged, can only be developed and moved to market with great difficulty and cost to the state and drillers, due to lack of existing infrastructure.

Obvious to only cursory inspection, several components of these applications appear redacted if not absent, such as the direction deviation letter application attached to the Kauffman 1-9 application but not the ML Investments 1-3 documents, although both proposals involve directional drilling. Geological profile and prognosis information is conspicuously redacted, thus disallowing public deliberation of potential underground interactions between oil, gas, geothermal, and water reservoirs and well structures, which could compromise the integrity and viability of some or all of these resources. The Kauffman 1-34 and ML Investments 1-3 well applications lack enclosed maps clearly illustrating topographic contour lines around wells and nearby private and public structures and indicating the possible downhill relationships of these infrastructures to the wells and the paths that surface spills could take if they happen. This lapse is especially troubling considering the directional drilling proposed for the ML Investments 1-3 well, where the target site of the production well bottom could fall close to Little Willow Road. According to a T-O Engineers graphic within the Kauffman 1-9 well application, AMS would drill under Little Willow Road. Both subterranean intrusions could eventually lead to land subsidence, disturbing the surface features surrounding and/or buttressing this public course. Well development so close to private and public structures displays reckless disregard for peer-reviewed science that recommends half-mile setbacks, and demonstrates a perspective of Idaho citizens as collateral damage.

As defined in its application suspiciously missing from the IDL website, the ML Investments 2-10 well pad – located within a mile of the proposed ML Investments 1-3 and 1-11 wells in the bluffs above New Plymouth – borders active, open, irrigation water canals and overlies abandoned irrigation ditches in the vicinity [6]. Saturated soil conditions or flooding events involving the proposed uphill ML Investments 1-11 well and well pad, compacted nearby roads, and these downslope and down-gradient irrigation structures could significantly impact irrigation
water systems and the individual and shared water rights and resources of downstream irrigation district water users. These potentialities and emergency contingency considerations are addressed nowhere in these applications.

WIRT associates also question the placement of the proposed ML Investments 1-11 well so close to the fault lines described in the ML Investments 2-10 application. In the fifth most seismically active state, locating well casings and cementing, which typically deteriorate to the point of leaking within 30 years on average, in such proximity further risks well integrity and the possibility of groundwater contamination. Also omitting descriptions in these applications of the locations and present conditions of nearby aquifers and the closest water wells discounts and risks pollution of these fresh water supplies. All of these instances of neglect, omission, redaction, and secrecy, evident in these four Alta Mesa Services applications for permits to drill, violate section 50 of IDAPA 20.07.02 Rules Governing Oil and Gas Conservation in the State of Idaho.

As the Idaho citizens who employ you, we expect you to uphold the well-being of Idaho lands and people, not the profit-driven motives of private industry and the state’s conflicting interests in revenues from reckless industry pursuits reliant on your approval, like these permit applications. The drilling plans and practices outlined in the AMS applications for permits to drill the ML Investments 1-3 and 1-11 and Kauffman 1-9 and 1-34 wells ignore and jeopardize the clean water and air and environmental and human health and safety that predicates Idahoans’ vital and cherished quality of life. State agency decisions and officials paid to serve the public’s best interests should not compromise Idaho oil and gas laws and rules to accommodate corporate and state greed. Along with growing public outrage, opposition, and pressure against these risky, tenuous, oil and gas drilling ventures, Wild Idaho Rising Tide will continue to encourage and build resistance across the state, through presentations and demonstrations, to relentlessly thwart and halt these and further, similar, industrial invasions, especially in reaction to obviously dangerous drilling near water bodies and other public assets. For the public record, Wild Idaho Rising Tide requests that the Idaho Department of Lands rejects, or at least requires revision and extended public review of, these four Alta Mesa Services applications, to ensure the best stewardship of Idaho’s priceless and irreplaceable private and public resources that their mismanagement could significantly impact.

With great concern for our shared natural resources and fellow Idahoans, thank you for your consideration of these comments and your accordingly responsive actions,

/s/ Helen Yost
Wild Idaho Rising Tide
P.O. Box 9817, Moscow, Idaho 83843
wild.idaho.rising.tide@gmail.com
WildIdahoRisingTide.org
Facebook.com/WildIdaho.RisingTide

[1] 11-075-20026 ML Investments #1-3 Application (Idaho Department of Lands)
[2] 11-075-20025 ML Investments #1-11 Application (Idaho Department of Lands)

[3] 11-075-20027 Kauffman #1-9 Application (Idaho Department of Lands)

[4] 11-075-20024 Kauffman #1-34 Application (Idaho Department of Lands)

[5] WIRT Comments to the Idaho Department of Lands on Alta Mesa Services’ Permit
Application for Drilling Well 1-21 (May 30, 2013 Wild Idaho Rising Tide)
http://wildidahorisingtide.org/2013/05/30/wirt-comments-to-the-idaho-department-of-lands-on-alta-mesa-services-permit-application-for-drilling-well-1-21/

[6] WIRT Comments on Alta Mesa Services Application to Drill ML Investments Well 2-10 (June 21, 2013 Wild Idaho Rising Tide)
http://wildidahorisingtide.org/2013/06/21/wirt-comments-on-alta-mesa-services-application-to-drill-ml-investments-well-2-10/

[7] Comments on the Trendwell West Application to Drill the Smith 1-10 Well (February 10, 2014 Wild Idaho Rising Tide)
http://wildidahorisingtide.org/2014/02/12/comments-on-the-trendwell-west-application-to-drill-the-smith-1-10-well/