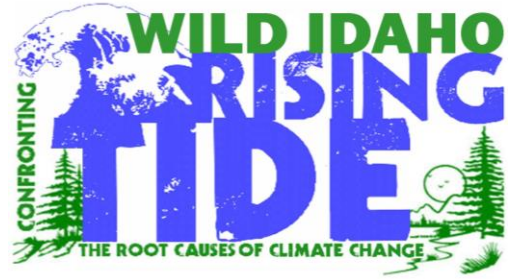


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November 14, 2014

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**Comments on the Alta Mesa Services Drilling Permit Application
for Smoke Ranch Well 1-20 near New Plymouth, Idaho**

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

On behalf of over 3200 members, friends, and allies of Wild Idaho Rising Tide (WIRT), including potentially impacted, concerned Idaho citizens and residents near proposed and existing Payette County oil and gas facilities, I respectfully offer and request inclusion in the public record of these comments regarding the application submitted to the Idaho Department of Lands (IDL) by Alta Mesa Services (AMS), requesting a permit to drill the Smoke Ranch 1-20 well near New Plymouth, Payette County, Idaho [1]. We incorporate into this official letter of opposition to IDL permitting of resulting AMS drilling activities on Birding Island the concerns, remarks, and linked citations enclosed in previous WIRT comments addressing Alta Mesa applications to develop the Kauffman 1-9 and 1-34 wells, the ML Investments 1-3, 1-11, and 2-10 wells, and the Smoke Ranch 1-21 well and the Trendwell West application to drill the Smith 1-10 well [2-5].

Incomplete Application

Obvious to only cursory inspection, many of the specifics of Alta Mesa Service's plans, beyond filed drawings, pictures, and vague assurances, and several components of this application appear redacted or postponed, if not absent. Stating the "distance, in miles, and direction from nearest town or post office" as only "3.02 miles NW of Post Office," AMS does not fully

disclose the well location in its incomplete application. The company also fails to mention the proximity of its proposed well to its adjacent Smoke Ranch 1-21 well drilled in July 2013, under the “distance from proposed location to nearest drilling, completed or applied for on the same lease,” or the existence of that currently capped, earlier well under “number of wells on lease, including that well, completed in or drilling to this reservoir.” With a recently drilled well so nearby, the necessity for exploratory “wildcat” drilling of a second well seems suspicious. Nondisclosure in this application of the northeasterly distance between the previously drilled Smoke Ranch 1-21 well and this proposed well may violate Idaho Oil and Gas Conservation Commission well spacing orders established for the state of Idaho [6]. Unlike the Tracy Trust 3-2 drilling permit application, submitted to IDL by Bridge Energy on June 23, 2010, Alta Mesa has attached no letter requesting a spacing exemption to this application, although Idaho legal proceedings document that the company is well aware of this requirement [7]. Although Cheryl and George Colwell and their companies Smoke Ranch, BIR Feedlot, and C/C negotiated a lease for almost 50 parcels of their lands and subsurface mineral rights to Snake River Oil and Gas and Weiser-Brown Oil Company, but not explicitly to Alta Mesa, this drilling application does not name the parties involved in the affected lease and thus undermines the legal legitimacy of the document and deters public discernment of financial interests and relationships [8].

With the likely storage and utilization at this proposed well site 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 the 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 assessment of two adjacent water wells, these applications lack descriptions of these imperative procedures so critical to necessary defense of the health and safety of Idahoans and the water and environmental resources upon which they rely for long-standing economic endeavors, such as agricultural production. Omitting descriptions in this application of the locations and present conditions of impacted aquifers and the closest water wells discounts and risks pollution of these fresh water supplies, as prohibited by Payette County ordinances and section 50 of IDAPA 20.07.02, the current rules governing Conservation of Crude Oil and Natural Gas in the State of Idaho [9].

Apparent in this permit application that discloses the “approximate date work will start” as November 13, 2014, neither IDL nor AMS and contracted companies seem amenable to accepting, much less considering and acting upon, public comments that are due the next day, on November 14, 2014. Although Alta Mesa dated its Smoke Ranch 1-20 well drilling permit application October 29, 2014, and IDL received and time-stamped it on October 30, 2014, Section 51 of IDAPA 20.07.02 mandates that submitted applications such as this one be posted on the Department’s (IDL’s) website for a fifteen-day (15) written comment period,...to receive written comments on whether a proposed application complies with these rules. These comments will be considered by the Department prior to permit approval or denial. Relevant comments will be posted on the Department’s website following the comment period [9].

How can this state agency legally allow such a rushed drilling schedule and burden the public with examining and offering feedback on this application within an already too-brief time frame, with the comment deadline and work start dates implying inexplicable dismissal of documented public concerns about the proposed drilling plan's violations of Idaho code? Despite their relevance to previous drilling applications and IDL's permitting decision processes, IDL has rarely posted prior WIRT comments and has not publicly compelled revision and/or rejection of incomplete and/or illegal Alta Mesa drilling applications for oil and gas wells in Payette and Canyon County, such as this AMS proposal. We accordingly anticipate stronger IDL communication with the public and a reopened comment period for public scrutiny and input, in response to the information set forth here and in other citizen comments and to subsequent AMS Smoke Ranch 1-20 well drilling application changes.

Geological profile and prognosis information is questionably redacted in this Smoke Ranch 1-20 well drilling application, 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 application also lacks topographic contour lines around the well and nearby private and public structures and water bodies in the enclosed map, which would clearly illustrate the possible down-gradient relationships of these features to the well and indicate the paths that surface spills could take if they happen. This lapse is especially troubling considering that the proposed vertical well targets floodplain bottomlands near a major water course, as later described in these comments. These aforementioned instances of Alta Mesa Services' neglect, omission, redaction, and secrecy, evident in its application for a permit to drill, violate section 50 of IDAPA 20.07.02, the rules governing Conservation of Crude Oil and Natural Gas in the State of Idaho, and thus compel IDL's delay and/or denial of approval of this application [9].

Floodplain Management

The Idaho Department of Water Resources Flood Hazard Mapping Tool identifies the Smoke Ranch 1-20 well site on parcel 1601980175B as within the Federal Emergency Management Agency's (FEMA) second most risky type of floodplain, "flood hazard area A" [10, attached photo]. According to federal regulations, Payette County must oversee development in a floodplain.

A floodplain development permit from the community is required for drilling oil and gas wells in a Special Flood Hazard Area...Any equipment at the site that could be damaged by floodwaters will have to be elevated above the BFE [base flood elevations] or made watertight and anchored to resist floatation, collapse, and lateral movement...Any material stored on the site that is highly volatile, flammable, explosive, toxic, or water reactive should be protected to at least the level of the 500-year flood...The community must also ensure that the developer has obtained any other required federal, state, and local permits prior to issuance of a floodplain development permit. This includes a permit from the state agency that regulates oil and gas activities and a Spill Prevention and Counter Measure Plan...If a drilling site is located in the floodplain, the developer should have an emergency action plan in place [11].

This Smoke Ranch 1-20 well drilling application does not note the floodplain characteristics and attendant regulations that Alta Mesa must consider and honor to proceed with oil and gas well development. Without proper government involvement in decisions about this well, Alta Mesa would inflict risks of huge financial losses incurred by the state of Idaho and Payette County and their citizens during and after future floods complicated by this Smoke Ranch oil and gas infrastructure and procedural negligence that undermine attempts to secure and seek payment of related insurance and government assistance.

In order for people in your county to be able to get flood insurance, or receive benefits from FEMA in the event of a flood (or maybe other) disaster, the county (or municipality if you happen to be in a town or city) has to have a 'floodplain ordinance.' That ordinance contains limits on construction in the floodplain...This is supposed to prevent filling the floodplain...that would make future floods more severe and damaging. The floodplain ordinance also contains a permit system that is supposed to make sure that the limits are observed. These ordinances have not always been applied to gas drilling etc. operations. But the ordinances do apply to drillers, and enforcement is occurring now. FEMA itself has recently issued technical guidance for floodplain permitting for oil and gas wells.

The driller has to get a permit from the county floodplain administrator before it can begin moving dirt into a 'flood hazard' area, which is another word for a floodplain. The decision of the floodplain administrator can be appealed to the County Commission. (Note that this floodplain ordinance/permit is a function of COUNTY government. The STATE Department of [Lands] does NOT issue or enforce this permit. The state [IDL] may informally make sure that the driller has at least applied for the county permit before the state will get to work issuing the state driller permit.) [12]

Although floods occur regularly in the Payette River watershed – as recently as 1996-97, 2001, 2010, and 2014 – with Fruitland and Payette perched precariously close to its outlet into the Snake River, Payette County appears either unaware of or unprepared for the legal necessity of a flood administrator, floodplain ordinance, and floodplain development permits [13-16]. FEMA mandates county compliance with federal floodplain management and wetland protection regulations, and thus could trump state of Idaho laws constraining county and city authority over oil and gas infrastructure (except planning and zoning laws) such as House Bill 464, state rules governing such development, and permitting decisions by agencies like the Idaho Department of Lands [17]. Local communities, the state, and FEMA developed the 2012 Payette Watershed Partnership Agreement, "a draft based on the results of discovery and subject to change...[that] will be finalized when agreement is reached" [18]. Its tentative nature infers that Payette River basin counties have not completed floodplain ordinances, much less established flood administrators and the consequent capacity to permit floodplain development such as both the present and proposed Smoke Ranch wells. Therefore, we are sending these extensive well drilling permit comments to not only the Idaho Department of Lands but to Payette County, the U.S. Environmental Protection Agency, Federal Emergency Management Agency, and other federal, state, and local agencies as listed below, to alert them to the potential violations of county, state, and federal codes that state permitting of the Smoke Ranch wells has or will impose. Such missteps could compromise county and citizen flood insurance and federal

emergency assistance, not to mention tempt oil and gas field disasters similar to the September 2013 eastern Colorado floods and/or invite legal challenges and injunctions of Birding Island well permits, arising from civil lawsuits against the county, state, and corporations [19].

Vulnerable Location

Despite outlined precautions in the Smoke Ranch 1-20 well application, entitled Site Preparation and explaining limitations on well and well pad discharges under normal operating conditions, no description appears in the application 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. Besides mentioning that the well site will include a two-foot-deep trench on the downhill sides, acting as a sump to collect rain and wash water for controlled release or appropriate disposal and supplying material for earthen berms around the location, Alta Mesa presents no information in its application about how it will inhibit and mitigate radioactive, toxic gas migration from drilled depths along the annulus around well casings infiltrated and scoured by powerful flood waters. Considering its location in a floodplain, WIRT believes that permitting and subsequent drilling of this proposed well could result in significant pollution impacts on fresh water supplies, as prohibited by section 50 of IDAPA 20.07.02, the rules governing Conservation of Crude Oil and Natural Gas in the State of Idaho, a possibility that requires IDL denial of drilling permit issuance for this AMS application [9].

WIRT associates object to the placement of this 4000-foot-deep, vertical, natural gas well, surrounded by casing that will immediately leak or face a 50-percent chance of seeping within 30 years, in such close proximity (only 385 estimated feet!) to the largest water body in the area, the Payette River. 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 private residential structures. Surely down-gradient wetlands in this floodplain island, the City of Fruitland drinking water intake facilities only a few miles downriver, and the Payette/Snake River confluence deserve stronger protections against the possibility of surface and ground water contamination. Regular municipal water quality tests required by the Safe Drinking Water Act may overlook certain poisonous constituents wrought by well development. Even without hydraulic fracturing (“fracking”) or other well treatments like acidizing, the majority of water pollution problems arising from natural gas and oil drilling across the United States have implicated aging and improper construction of well casings. Industry studies show that five to seven percent of all new oil and gas wells leak and that, as wells deteriorate, 50 percent fail mechanical integrity tests within 30 years. 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, as in this case where a wildcat well targets a reservoir thousands of feet deep.

Located on the floodplain of Birding Island – full of standing water, wetlands, riparian areas, and wildlife habitat between Big Willow Creek and the Payette River – the soggy Smoke Ranch 1-20 well site would further chance the integrity of cement and metal well casings near local fault lines in the fifth most seismically active U.S. state [20]. Subterranean intrusion of a second tenuous drilling project could eventually lead to land subsidence, disturbing the surface features

of low-lying, flood-prone lands surrounding and/or buttressing this Smoke Ranch 1-20 well. Saturated soil conditions or flooding events involving the proposed well and well pad, compacted nearby roads, and irrigation structures could significantly impact irrigation water systems and the individual and shared water rights and resources of downstream irrigation district water users. Such mishaps and associated hazards could compromise the value, insurability, and salability of private property, especially existing agricultural businesses, residential dwellings, and water wells downstream from this Smoke Ranch well. Oil and gas development so close to private and public structures and waterways displays reckless disregard by IDL and AMS for peer-reviewed science that recommends half-mile setbacks, and demonstrates a perspective of Idaho citizens as collateral damage. These potentialities and emergency contingency considerations are addressed nowhere in this application.

Upstream from the proposed well and the river/creek convergence, the braided channels, lush islands, riparian banks, remote wetlands and ponds, and myriad species refuge of the Payette River Wildlife Management Area, one thousand-plus feet to the southeast, will suffer similar, if not magnified, significant impacts like those foisted upon the distantly recognizable sandstone cliffs and bluffs above the river and the working ranches, exposed community irrigation canals, and neighbors in the immediate vicinity who choose to live in the relatively clean and quiet rural landscape [21]. Drilling in riverine places most vulnerable to air, water, and soil contamination is not in the best interests of Idahoans and the environment upon which they rely for local agricultural, economic, and recreational activities and productivity. Constant air, noise, and visual pollution, increased traffic, compromised health of self, family, and friends, and reduced home, business, and land property values make the human, wildlife, and environmental health and safety ramifications of Smoke Ranch wells enormous, as residents relinquish land for seeking and growing food in exchange for out-of-state-and-country companies extracting, transporting, exporting, and combusting Idaho gas resources. With these development externalities ultimately costing Idahoans more than the immediate benefits received mostly by drill-and-run oil and gas exploiters, WIRT cannot imagine a clearer definition of “a waste of oil or gas [and] a violation of correlative rights,” forbidden by section 50 of IDAPA 20.07.02 [9].

Backed only by questionable financial resources and abetted by IDL drilling permits and leases of public lands and minerals at ridiculously low rates, crowded, expensive, exploratory forays into southwestern Idaho gas fields by Alta Mesa 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, potentially tragic 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, county, and oil and gas companies, due to lack of appropriate, existing infrastructure.

Payette County citizens and officials have observed and documented with digital, dated photos numerous risky practices at the Smoke Ranch 1-21 well site, before, during, and after drilling that commenced in July 2013 [22]. They witnessed standing water covering the well pad prior to drilling and a generator next to a freshly dug hole, which appeared to pump groundwater (and

later toxic chemicals?) from under this dirt pad in a floodplain. A leaking, liquid-bearing vehicle parked on the dirt road to the square well pad paralleling Highway 52, and personnel on site utilized a loader and a shovel to dump sawdust and shavings on top of a possible diesel fuel or drilling mud spill of unknown volumes but with a strong diesel odor, covering an area at least 15 feet by 25 feet [23]. Alta Mesa crews undertook no efforts to remove or remediate the contaminated soil/shavings over the following week of citizen monitoring, and a formal public records request to IDL offices in Boise for a spill incident report revealed no agency knowledge of the situation nor the appropriate reporting and remediating procedures for such spills at IDL-permitted oil and gas wells.

While Alta Mesa hurriedly installs gathering lines under miles of Payette River floodplain, from a dozen idle, shut-in wells to the soon-complete Highway 30 processing plant and a decades-old, regional pipeline, Payette County hydrocarbon exploration, extraction, and production and subsequent climate disruption could soon escalate. Rapid, destructive oil and gas development on Birding Island, especially imposing well treatments such as fracking and acidizing, could deplete nearby refuge-dependent wildlife and perhaps unlawfully obtained, over-allocated water and could mix drilling mud chemicals in this high-water-table floodplain with surrounding wetlands, creeks, rivers, and wildlife habitat. The eventual outcomes of the Smoke Ranch wells could set dangerous precedents for impending drilling, fracking, and acidizing on and under state lands and waters already leased by Alta Mesa and Snake River Oil and Gas. The Idaho Department of Fish and Game has leased Payette River Wildlife Management Area lands for drilling near and below the river, while excluding less toxic and disruptive public recreation that could disturb breeding and nesting resident and migratory birds. The Idaho Department of Lands has similarly leased thousands of acres around and beneath the Boise and Snake rivers and the majority of the Payette River in Payette County [24].

Delay & Deny This Permit

As the Idaho citizens who employ IDL, Wild Idaho Rising Tide expects IDL staff to uphold the well-being of Idaho waters, lands, wildlife, minerals, and residents over the profit-driven motives of private industry and the state's conflicting interests in revenues from reckless corporate pursuits reliant on IDL approval, like this Smoke Ranch 1-20 well proposal. The plans and practices outlined in this drilling permit application ignore and jeopardize the clean water and air and environmental and human health and safety that predicate 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 oil and gas drilling ventures, WIRT will continue to encourage and build resistance across the state, through ongoing statewide presentations and demonstrations, to relentlessly thwart and halt this and further industrial invasions, especially in reaction to obviously dangerous drilling near water courses and other public assets.

In accordance with the current rules governing Conservation of Crude Oil and Natural Gas in the State of Idaho, and considering the inadequacy and incompleteness of Alta Mesa Service's application for a Smoke Ranch 1-20 well drilling permit and the aforementioned and other possible significant impacts on fresh water supplies, natural resources, public infrastructure, and

associated health, social, and economic conditions, we strongly recommend that the Idaho Department of Lands responsibly address the concerns and issues raised in these comments. For the public record, Wild Idaho Rising Tide requests that IDL should reject or at least require revision and extended public review of this Alta Mesa Services application, to ensure the best stewardship of Idaho's priceless and irreplaceable public and private resources that their mismanagement could significantly impact.

With great concern for our shared natural resources and fellow citizens in Idaho, thank you for your consideration of these comments and your responsive communication and actions,

/s/ Helen Yost, MSEE
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Clement Leroy “Butch” Otter, Governor, Boise, Idaho
Pete Wagner, Regional Administrator, Idaho Department of Environmental Quality, Boise, Idaho
Lance Holloway, Watershed Manager, Idaho Department of Environmental Quality, Boise, Idaho
Barry Burnell, Water Quality Division Administrator, Idaho Department of Environmental Quality, Boise, Idaho
Michael McIntyre, Surface Water Program Manager, Idaho Department of Environmental Quality, Boise, Idaho
Virgil Moore, Director, Idaho Department of Fish and Game, Boise, Idaho
Scott Reinecker, Southwest Regional Supervisor, Idaho Department of Fish and Game, Boise, Idaho
Rick Ward, Southwest Region Environmental Staff Biologist, Idaho Department of Fish and Game, Boise, Idaho
Payette County Commissioners, Payette, Idaho
Payette County Planning and Zoning Commission Members, Payette, Idaho
City of Payette Mayor and City Councilors, Payette, Idaho
City of Fruitland Mayor and City Councilors, Fruitland, Idaho
Natalie Havlina, Attorney, Boise, Idaho
Alma Hasse, Idaho Concerned Area Residents for the Environment, Fruitland, Idaho
Tina Fisher, Idaho Residents Against Gas Extraction, Fruitland, Idaho
Joe Morton, Gem County Concerned Citizens, Emmett, Idaho
Adrienne Evans, United Action for Idaho, Boise, Idaho
Justin Hayes, Idaho Conservation League, Boise, Idaho
Kevin Lewis, Idaho Rivers United, Boise, Idaho
And others who will receive these comments after initial letter transmission

[1] *Application for Permit to Drill Smoke Ranch Well 1-20* (October 29, 2014 Alta Mesa Services)

<http://www.idl.idaho.gov/oil-gas/commission/well-permits/smoke-ranch-1-20-redacted-10312014.pdf>

[2] *WIRT Comments to the Idaho Department of Lands on Alta Mesa Services’ Permit Application for Drilling Smoke Ranch 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/>

[3] *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/>

[4] *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/>

[5] *WIRT 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* (June 21, 2014 Wild Idaho Rising Tide)
<http://wildidahorisingtide.org/2014/06/21/wirt-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/>

[6] *Final Order in the Matter of the Petition by AM Idaho, LLC, Requesting Amendment to the Spacing Order for the Hamilton and Willow Fields* (April 16, 2013 Idaho Oil and Gas Conservation Commission)
<http://www.idl.idaho.gov/oil-gas/commission/042413-am-idaho-final-spacing-order.pdf>

[7] *Application for Permit to Drill Tracy Trust Well 3-2* (June 23, 2010 Bridge Energy)
<http://www.idl.idaho.gov/oil-gas/commission/well-permits/LU600026-redacted.pdf>

[8] *Memorandum of Oil and Gas Lease* (May 26, 2011 State of Idaho, Payette County Instrument 372538)
<http://documentsearch.payettecounty.org/recording/ViewDocument.aspx?id=372538>

[9] *Conservation of Crude Oil and Natural Gas in the State of Idaho* (Idaho Department of Lands)
<http://adminrules.idaho.gov/rules/current/20/0702.pdf>

[10] *Flood Hazard Mapping Tool* (Idaho Department of Water Resources)
<http://maps.idwr.idaho.gov/FloodHazard/Map>

[11] *Interim Technical Guidance on Drilling Oil and Gas Wells in Special Flood Hazard Areas (SFHA)* (Federal Emergency Management Agency National Flood Insurance Program)
<http://www.wvsoro.org/resources/advice/FloodPlainGasWellGuidanceFEMA.pdf>

[12] *If the Driller's Proposed Well Pad is in a FEMA 100-year "Flood Hazard" Zone, You May Be Able to Block It or Make Them Move It!* (June 3, 2013 West Virginia Surface Owners' Rights Association)
<http://www.wvsoro.org/resources/advice/advice25.html>

[13] *History of the Payette River* (PayetteRiver.org)
<http://www.payetteriver.org/history-of-the-payette-river/>

[14] *Payette River Flooding Homes* (June 6, 2010 KBOI)
<http://www.kboi2.com/news/local/95729889.html>

[15] *Flooding Expected for Boise, Payette Rivers* (June 29, 2014 KTVB)
<http://www.ktvb.com/story/news/local/2014/06/29/11736183/>

[16] *Flood Information* (Payette County)

<http://www.payettecounty.org/index.php/sheriff/flood-information>

[17] *Floodplain Management and Protection of Wetlands, Emergency Management and Assistance* (October 1, 2002 Code of Federal Regulations)

<http://1.usa.gov/11snbIJ>

[18] *2012 Payette Watershed Partnership Agreement* (Federal Emergency Management Agency)

<http://www.bhs.idaho.gov/Pages/Plans/RiskMap/Risk%20MAP%20Partnership%20Agreements/PAYETTE.pdf>

[19] *E. Coli, Oil Spills, and Airlifts: Fallout from Colorado Flooding Continues* (September 20, 2013 Cable News Network)

<http://www.cnn.com/2013/09/20/us/colorado-flooding/>

[20] *Birding Island and Smoke Ranch Well 1-20* (November 6, 2014 Google Maps)

<http://goo.gl/maps/ZxVQ0>

[21] *Payette River Wildlife Management Area* (Idaho Department of Fish and Game)

<http://fishandgame.idaho.gov/ifwis/ibt/site.aspx?id=55>

[22] *Smoke Ranch Well Site 6-8-13* (June 9, 2013 Wild Idaho Rising Tide)

<http://wildidahorisingtide.org/2013/06/09/smoke-ranch-well-site-6-8-13/>

[23] *WIRT Newsletter: Idaho Drilling/Fracking Updates, Risks, and Resistance News* (August 19, 2013 Wild Idaho Rising Tide)

<http://wildidahorisingtide.org/2013/08/19/wirt-newsletter-idaho-drilling-fracking-updates-risks-resistance-news/>

[24] *Idaho Auctions Off the Payette River to Oil and Natural Gas Company* (September 2, 2012 Wild Idaho Rising Tide)

<http://wildidahorisingtide.org/2012/09/02/idaho-auctions-off-the-payette-river-to-oil-and-natural-gas-company/>