

Wild Idaho Rising Tide

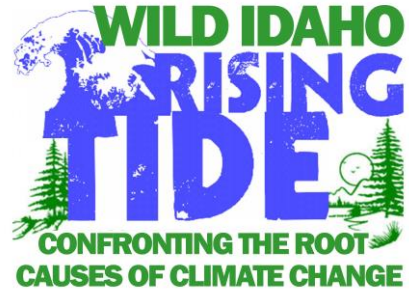
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Sent via email message with attached, duplicate, PDF letter, as an organizational response intended for Idaho Department of Lands and Idaho Oil and Gas Conservation Commission review and website posting

WIRT Comments on Snake River Oil and Gas Application for Permit to Drill Miller 1-15 Well

For the official record of Snake River Oil and Gas' (SROG) application to drill the Miller 1-15 methane gas well under and near Fruitland, Payette County, Idaho, submitted to the Idaho Department of Lands (IDL) on March 31, 2026, and posted for public review on April 3, 2026, on the Idaho Oil and Gas Conservation Commission (IOGCC) website, as required by Idaho Code § 47-316(1)(c), I respectfully offer these written comments and accompanying information on behalf of Wild Idaho Rising Tide (WIRT) and its over 3,000 climate activists, members, friends, supporters, and allies, as citizens of Idaho, Montana, Oregon, Washington, and other U.S. states, who work, reside, and/or own property and/or businesses in or near Fruitland, Idaho, and the Payette and Snake rivers and surrounding and downstream aquifers and watersheds that SROG's Miller 1-15 well drilling application, permit approval, and infrastructure construction and operation would directly impact [1, 2]. We object to SROG's Miller 1-15 project invasion and its significant, cumulative impacts on affected communities, critical ecosystems, public air, water, land, and resources, and private and City of Fruitland water sources within the floodplain and close to the Payette River, as insufficiently identified and analyzed in SROG's application for a permit to drill the Miller 1-15 hydrocarbon well, and in pertinent government documents and accompanying notices offering limited public information, via IDL and IOGCC website pages [1, 2].

We also object to this SROG project's significant, cumulative, direct and indirect, adverse impacts on climate change, endangered species, cultural resources, socioeconomic and

environmental factors, and reasonable public needs including human and environmental health and safety, drinking and agricultural water, and private property values, rights, uses, enjoyment, and insurability. As further public input and information shared with IOGCC and IDL, we incorporate by reference, into this letter of resistance to IDL/IOGCC permitting of Miller 1-15 drilling activities, the written and oral comments and linked articles and documents of WIRT and all persons and organizations raising oppositional concerns about this venture and its applications, permits, and procedures relevant to project analyses, presented through all local, state, and federal public processes before, during, and after SROG Miller 1-15 well spacing, integration, and drilling applications.

WIRT earnestly requests and urges IOGCC and IDL to: 1) Include in the public record for SROG's Miller 1-15 drilling application and for related project comment periods these and all of our written objections and linked citations enclosed in these and previous WIRT comments addressing Snake River Oil and Gas' Barlow 1-14 and 2-14 well drilling and associated applications and permits, and SROG's direct predecessor Alta Mesa's 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 1-20 and 1-21 wells, and the Trendwell West application to drill the Smith 1-10 well [3-9]; 2) Expand public involvement beyond impacted mineral holders, willing and forced leasers, and commenters considering the Miller 1-15 well drilling application; 3) Conduct open, public hearings and comment periods in the most affected communities, regarding the Miller 1-15 well drilling application and its relevance to previous, current, and potential spacing and integration orders issued by the state and/or opposed and litigated by concerned stakeholders; 4) Better assess the regional significance, scope, and precedence of the hazardously located Miller 1-15 well, through a revised, SROG drilling application, more explicit spacing and integration applications, and associated public input processes; 5) Perform a community-preferred, scientifically rigorous, independent, unbiased, full environmental study and baseline, adjacent water well testing examining this controversial project; and 6) Delay and deny this unnecessary and harmful, fossil fuel infrastructure expansion and consequent exploitation of private and public resources.

WIRT has encouraged and documented public participation in comments and testimony for the Miller 1-15 integration and drilling applications, by sending and/or posting two alerts and recording and broadcasting the passionate input provided by concerned, force-pooled, and water well-ruined, Fruitland area citizens at a packed, December 17, 2025, public hearing considering whether IDL would force hundreds of property owners to lease their methane gas and allow nearby drilling against their will [10-12]. Besides this outreach, WIRT offers these formal remarks drawn from our multiple years of experience, knowledge, and direct interests in this and previous, related, drilling applications, spacing and integration orders, and legal challenges considered at state hearings and in federal courts. This letter of objection to the Miller 1-15 methane well also arises from detailed suggestions and guides provided by our colleagues of Citizens Allied for Integrity and Accountability (CAIA) and project-impacted property and mineral holders. We fully support and incorporate by reference into these comments these parties' resistance to the Miller 1-15 well and its forced integration as well as CAIA's successful, U.S. District Court case rulings, which continue to legally bind proposed and permitted, SROG spacing and integration orders and this drilling application. Together, we have identified the following, described problems with the application for and fossil fuels extraction from the SROG

Miller 1-15 well, which do not adequately evaluate oil and gas production and transportation risks to the surrounding community of life.

Dangerous Miller 1-15 Well Location

Despite outlined precautions in the Miller 1-15 well drilling application, explaining site preparation and 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 and emissions that could contaminate the surrounding environment, watershed, and inhabitants. Besides mentioning that the well site will include trenches to collect rain and wash water for controlled release or appropriate disposal and to supply material for earthen berms around the location, SROG presents no information in its application about how it will inhibit and mitigate the migration of radioactive, toxic methane gas from drilled depths to the surface, along the annulus around well casings that powerful flood waters could potentially infiltrate and scour. Considering the location of the proposed Miller 1-15 well within a floodplain, only a few hundred feet from homes in high-density subdivisions, and within one-half to one mile from low-income housing units, childcare and assisted living centers, schools, playgrounds, sports complexes, churches, medical centers, emergency rooms, and cancer treatment and hospice facilities, WIRT expects that state permitting and subsequent volatile drilling of this well will result in significant pollution of the fresh water supplies of a nearby canal and multiple water wells, mapped on pages 10 and 11 of the SROG Miller 1-15 well drilling application [1]. As prohibited by IDAPA 20.07.02, the Rules Governing Conservation of Oil and Natural Gas in the State of Idaho, this pollution possibility requires that IDL/IOGCC deny drilling permit issuance for this SROG application [13]. The Miller 1-15 well application specifically states under Permit Denial on page 2 that, per Idaho Code § 47-315, “Applications may be denied for the following reasons: ...Proposed well will result in a waste of oil or gas, a violation of correlative rights, or the pollution of fresh water supplies” [1].

WIRT associates object to the placement of the directionally-drilled, Miller 1-15 well, surrounded by casing that will immediately or soon leak or face a 50-percent chance of seeping within 30 years, in such close proximity to multiple residences, businesses, and buildings reliant on the aforementioned water wells and in the floodplain of the largest water body in the area, the Payette River. Even without hydraulic fracturing (“fracking”), acidizing, or other well stimulation treatments, the majority of water pollution problems arising from oil and gas drilling across the United States has 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. And the deeper the well, the more radioactive the produced material, as in this case, where the well obliquely targets a reservoir 5,000 feet deep, directly beneath a Payette River tributary destabilized by a bisecting railroad line. Regular, municipal water quality tests required by the Safe Drinking Water Act may overlook certain poisonous water constituents wrought by methane well development. Surely, down-gradient wetlands and their wildlife residents, City of Fruitland and private drinking water intake facilities, surrounding, economically vital, agricultural and recreational enterprises, and the ecologically unique, Payette/Snake River confluence deserve stronger protections against the possibilities of surface and ground water

contamination than permitting and producing the predictably polluting Miller 1-15 gas well.

Located in the floodplain of the Payette River, full of standing water, wetlands, riparian areas, and wildlife habitat, the soggy, Miller 1-15 well site would further risk the already precarious integrity of cement and metal well casings around the well located near local fault lines in the fifth most seismically active U.S. state. The Treasure Valley has experienced scores of aftershocks since the 6.5 magnitude earthquake on March 31, 2020, which may have already compromised the mechanical integrity of dozens of lower Payette River watershed fossil fuels wells [14]. Subterranean intrusion of this tenuous, aquifer-polluting, Miller 1-15 well would not only compound cumulative, local, oil and gas well damages to water and hydrocarbon reservoirs, all disrupted by recent quakes, but could also eventually lead to land subsidence, disturbing the surface features of low-lying, flood-prone lands surrounding and/or buttressing the Miller 1-15 well. Compacted, impermeable, well construction features and nearby roads and irrigation structures, combined with saturated soil conditions or flooding events involving the proposed, drilled well and well pad, could significantly impact surrounding and downstream irrigation water systems and the individual and shared water rights and resources of irrigation district water users. Miller 1-15 well inundation and pollution mishaps and associated hazards could compromise the value, insurability, and salability of nearby private property, especially existing agricultural businesses, residential dwellings, and water wells downstream from this methane well. 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 1,000 feet between fossil fuels wells and private residential structures, greater than the 138 to 535 feet between the Miller 1-15 well and the nearest occupied structures depicted in SROG's drilling application [1]. Oil and gas development so close to private and public buildings and waterways displays reckless disregard by SROG, IOGCC, and IDL of peer-reviewed science that recommends half-mile setbacks, and demonstrates their perspective of Idaho citizens and their properties as collateral damage. SROG addresses such emergency contingency considerations of hazardous potentialities and protective setbacks nowhere in the Miller 1-15 drilling application. It is thus incomplete and reasonably denied a state permit, as mandated by IDAPA 20.07.02.200.05 and stated in the application, and could also make SROG and the state of Idaho liable for damages and compensation sought through litigation, in the aftermath of a natural or industry disaster [1, 13].

Surrounding and down-current from the proposed Miller 1-15 well, myriad plant and wildlife species find refuge in the braided channels, lush islands, riparian banks, remote wetlands and ponds, and creek convergences of the Payette River, and would suffer similar, if not magnified, significant impacts like those foisted upon the exposed, nearby homes, businesses, working ranches, community irrigation canals, and neighbors in the immediate vicinity, who choose to live in the relatively clean and quiet, rural landscape. Drilling in riverine places most vulnerable to air, water, and soil contamination, like Fruitland between the Payette and Snake rivers, counters the best interests of Idahoans and the environments upon which they rely for local agricultural, economic, and recreational activities and productivity. The Miller 1-15 well would inflict enormous human, wildlife, and environmental health and safety ramifications including constant air, noise, and visual pollution, increased traffic, compromised health of individuals, families, and friends, and reduced home, business, and land property values. Out-of-state companies, workers, and consumers extracting, transporting, exporting, and combusting Idaho

hydrocarbon resources could cause residents to relinquish lands and waters essential to securing basic amenities, like food, water, and shelter, and prompt them to reduce their participation in productive, economic activities. With well development externalities ultimately costing Idahoans more than the immediate benefits received from drill-and-run, oil and gas exploiters, WIRT cannot imagine a clearer instance of a “proposed well resulting in a waste of oil or gas, a violation of correlative rights, or the pollution of fresh water supplies,” forbidden by IDAPA 20.07.02 and eligible for well permit denial under IDAPA 20.07.02.200.05, as noted in the Miller 1-15 well drilling application [1, 13].

Backed only by increasingly questionable financial resources, and abetted by IDL drilling permits and leases of public and private lands and minerals at ridiculously low rates, the crowded, expensive, exploratory “wildcat” forays into southwestern Idaho gas fields by SROG and its predecessors reveal both the regional reservoir’s marginal productivity and its desperate theft by corporate usurpers of rights and resources. Geologists have stated that the target area holds very little oil and gas reserves, obvious in the close proximity of SROG wells, such as the Miller 1-15 and Fallon 1-10 wells, which could not only rupture the integrity of underground water and methane reservoirs, but could also require toxic, potentially tragic, well stimulation techniques to maximize flows from small hydrocarbon deposits. Moreover, such apparently meager oil and gas resources in Idaho, previously bypassed by larger fossil fuels companies, before current, extreme energy extraction technologies like fracking and acidizing emerged, can only be developed and moved to market with great difficulty and cost to the state, county, city, leasers, and oil and gas companies, due to lack of appropriate, existing infrastructure.

With digital, dated photos and videos, Payette County citizens and officials have observed and documented numerous risky practices at other SROG well sites before, during, and after drilling commenced. They witnessed a leaking, liquid-bearing vehicle parked on the dirt road to a well pad paralleling Highway 52, standing water covering a well pad prior to drilling, and a generator next to a freshly dug hole, which appeared to pump groundwater (and toxic chemicals?) from under a dirt drill pad in a floodplain. Personnel at one site utilized a loader and a shovel to dump sawdust and shavings on top of a possible diesel fuel or drilling mud spill, covering an area at least 15 feet by 25 feet and of unknown volumes, but with a strong diesel odor [15]. Crews undertook no efforts to remove or remediate the contaminated soil/shavings during 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. WIRT further reminds IOGCC and IDL of the some of the worst, local manifestations of corrupt industry practices that occurred when SROG partner/predecessor Alta Mesa treated a well without legally required notification, application, approval, inspection, and documentation of acidizing production stimulation [16].

While SROG hurriedly installs gathering lines under miles of Payette River floodplain, from a dozen idle, shut-in wells to the Highway 30 processing plant and a decades-old, regional, Williams Northwest pipeline, Payette County hydrocarbon exploration, extraction, production, and subsequent climate disruption could soon escalate. Rapid, destructive, oil and gas development near the Payette River, especially imposing well treatments such as fracking and acidizing, could deplete nearby 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, probably disastrous outcomes of the Miller 1-15 methane well could set dangerous precedents for impending drilling, fracking, and acidizing on and under state lands and waters already leased by Snake River Oil and Gas. The Idaho Department of Fish and Game has leased Payette River Wildlife Management Area lands a few miles upstream 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 [17].

Floodplain Management of Miller 1-15 Well

The Idaho Department of Water Resources' Idaho Flood Hazard Map identifies the Miller 1-15 well site as within a Federal Emergency Management Agency (FEMA) floodplain hazard area [18, 19]. 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 [18].

The Miller 1-15 well drilling application does not note the floodplain characteristics and attendant regulations that SROG must consider and honor to proceed with oil and gas well development. Without proper government involvement in decisions about this well, SROG 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 Miller 1-15 oil and gas infrastructure and the procedural negligence that undermines attempts to seek and secure 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.) [20]

Although floods occur regularly in the Payette River watershed – as recently as 1996-97, 2001, 2010, 2014, and later – with Fruitland and Payette perched precariously close to its outlet into the Snake River, Payette County appears either unaware or unprepared for the legal necessity of a flood administrator, floodplain ordinance, and floodplain development permits [21-24]. FEMA mandates county compliance with federal floodplain management and wetland protection regulations, and thus could override 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 IDL and IOGCC [25].

Local communities, the state of Idaho, and FEMA developed the 2012 Payette Watershed Partnership Agreement, “a draft based on the results of discovery and subject to change,...[which] will be finalized when agreement is reached” [26]. Its tentative nature implies 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 the proposed Miller 1-15 methane well. Therefore, we are sending these extensive, Miller 1-15 drilling application comments to not only IOGCC and IDL, but also to other federal, state, and local agencies, to alert them to the potential violations of county, state, and federal codes that state permitting of the Miller 1-15 well would impose. Such an IDL/IOGCC misstep 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 Miller 1-15 well permits and associated orders, arising from civil lawsuits against the county, state, and corporations [27].

Inadequate Miller 1-15 Drilling Application

Obvious to only cursory inspection beyond filed drawings, pictures, maps, and vague assurances, several components and many specifics of SROG's Miller 1-15 well plans appear suspiciously missing. In stating the distance and direction of the Miller 1-15 well from the nearest structures, SROG fully discloses the well location, but its incomplete and inadequate drilling application fails to mention the possibly dangerous repercussions of the proximity of its proposed well to adjacent homes and businesses less than 150 feet away. Separate mineral rights leases for the Miller 1-15 well, including hundreds of objecting residential properties and businesses in the center of the City of Fruitland, similarly require legally binding descriptions of the spacing unit

and integration applications and orders and potential consequences of Miller 1-15 well construction and operation. Nondisclosure in this SROG application of the distance between the proposed Miller 1-15 well and affected structures may violate Idaho Oil and Gas Conservation Commission well spacing regulations established for the state of Idaho [28]. Associated state documents and proceedings deliberating the Miller 1-15 well spacing and integration orders, along with drilling permit approval, may ultimately abet damages to voluntary and forced gas lessors, and thus foist the burden of harm onto these impacted parties, from SROG's attempts to hasten permitting that disregard state requirements for spacing, integrating, and drilling the methane reservoir. Although stakeholders in the Miller 1-15 spacing unit and integration negotiated or resisted leases of their subsurface mineral rights, they must explicitly finalize such agreements with Snake River Oil and Gas before well drilling can proceed. Without public discernment of the financial interests, relationships, and liabilities involving the Miller 1-15 well, its drilling and other applications accordingly undermine the legitimacy of any SROG claims to organized development of the oil and gas resource, which would purportedly neither waste the oil and gas asset nor violate correlative rights to it, as prohibited by IDAPA 20.07.02 and thus well drilling permit approval [13, 29].

With the likely storage and utilization at the proposed Miller 1-15 well site of the usual slurry of volatile and toxic chemical substances constituting most drilling muds, state and local 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 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. But the Miller 1-15 well drilling application lacks descriptions of these imperative procedures so critical to the 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 the Miller 1-15 well application of the locations and current conditions of impacted aquifers and the closest water wells discounts and risks pollution of these fresh water supplies, banned by Payette County ordinances and section 50 of IDAPA 20.07.02, Rules Governing Conservation of Oil and Natural Gas in the State of Idaho [13].

Some geological profile and prognosis information is also questionably absent in SROG's Miller 1-15 well drilling application, thus disallowing public consideration 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. For instance, page 12 of the application mentions the nearby, existing, Fallon 1-10 gas well, but does not disclose its location and proximity to the planned Miller 1-15 well. Pertinent application maps also lack fine scale topographic contour lines around the Miller 1-15 well and nearby private and public structures and water bodies, which would otherwise clearly illustrate the possible down-gradient relationships of these features to the well, and indicate the paths that surface spills could travel if they happen. This lapse is especially troubling as the proposed well targets a floodplain near a major water course, the Payette River, upstream only a few miles from the City of Fruitland water intake facility. These examples of SROG's neglect, omission, and secrecy, evident in its application for a permit to drill the Miller 1-15 well, violate section 50 of IDAPA 20.07.02, and thus compel IDL/IOGCC's delay and/or denial of approval of this application [13].

Apparent in the closely successive drilling start date schedules of the riverside James 1-10 methane well (March 1, 2026) and the densely populated Miller 1-15 gas well (May 1, 2026), outlined in their applications filed by SROG and reviewed by the state of Idaho, SROG and IDL never intended to revise their plans in response to public input, which they could have requested much earlier or later than overlapping public comment periods and hearings for respective integration and well drilling applications around the winter holidays. Such maneuvers belie the intentions of SROG, IDL, and IOGCC to remain unamenable to accepting, much less considering and acting upon, public comments that are predictably outshouted by SROG legal arguments and filings. Section 51 of IDAPA 20.07.02 mandates that industry-submitted applications, such as the Miller 1-15 drilling application, must be posted on IOGCC/IDL's website for a fifteen-day (15) period, to receive written, public and stakeholder comments on whether a proposed application complies with Idaho oil and gas rules. Idaho laws also require that IOGCC and IDL consider all relevant comments, prior to permit approval or denial, and post comments on IOGCC/IDL's website during and following the comment period [13].

How can these state agencies legally allow such rushed spacing, integration, and drilling schedules and burden the public with examining and offering feedback on applications they intend to approve anyway? A website-posted, Miller 1-15 drilling application lacking documents and comments for attendant spacing and integration applications and orders, within an already too-brief time frame for public participation, implies inexplicable dismissal of justified public concerns about the proposed drilling plan's violations of Idaho code, not to mention its hazards for public and environmental health and safety unaddressed in its application. For example, despite the relevance of prior WIRT comments to previous drilling applications and the state's permitting decision processes, IDL has rarely posted WIRT remarks and has seldom publicly compelled revision and/or rejection of incomplete and/or illegal, prior drilling applications for oil and gas wells in Payette and Canyon County, such as this SROG proposal. We accordingly anticipate stronger, more adaptive, IDL communication with the public, and comment periods extended or reopened for public scrutiny and input on the Miller 1-15 well spacing, integration, and drilling applications and permits, in response to the information set forth here and in other citizen comments that substantiate SROG application changes.

Careless Miller 1-15 Well Drilling Approval

* Does not ensure the protection of the constitutional rights of not only impacted mineral and property owners but also nearby residents, businesses, and all other Idaho citizens and communities who could encounter oil and gas extraction in the future. State regulatory decisions on this Miller 1-15 situation would set precedents for the hundreds of thousands of acres leased by oil and gas companies, for drilling activities that could adversely affect neighborhoods in Payette County, across the Treasure Valley, and in eastern and the rest of Idaho.

* Serves as another precursor to other attempts to integrate/force pool, aggressively lease, and destructively extract the oil and gas of unwilling mineral, land, and property owners near the Payette River in the Fruitland area and Payette County. As the last administrative step toward integration of private mineral interests for oil and gas extraction, drilling applications predictably allow state regulators to force citizens to surrender their privately owned oil and gas for a

pittance of its value and without adequate protections of other private and public resources. But both its spacing and integration applications and orders are not publicly posted with the Miller 1-15 well drilling application.

* Targets a similar subsection of tracts specified in prior, SROG, Fallon 1-10 spacing and integration applications, although the combined operation and significant, cumulative impacts of the Miller 1-15 and Fallon 1-10 wells, in undisclosed and possibly close proximity, may require modifications of the size of both surrounding spacing units and revised spacing and integration applications for the Miller 1-15 well. All the property and mineral owners and environment covered (or predictably neglected) in these initial applications would share the negative consequences of state decisions on the previous, Fallon 1-10 and current, Miller 1-15 spacing unit proposals, integration orders, and drilling permits, regardless of resource ownership and receipt of lease payments and royalties.

* Necessitates the same judicial recourses sought by Idaho citizens and granted in 2018 by a federal judge, who ruled that similar applications and their planned actions violate the constitutional, property, and civil rights of Idahoans whose minerals had been force pooled by the state and companies associated with SROG.

* Recklessly endangers Idahoans and their properties and rights, with the senseless rush by Idaho regulators to push well production and integration that result in more costs than benefits to Idahoans, especially during the current, worldwide, oil and gas struggles and historically high oil and gas prices, which could together force less expensive, irresponsible, SROG business practices that threaten health and safety and pollute water, air, and soil.

* Encourages construction of pipelines to riskily carry oil and gas from the Miller 1-15 well under public infrastructure and the Payette River in various locations, threatening leaks and accidents at gas wells and along pipelines, which could contaminate river and irrigation canal water, underground aquifers, private and Fruitland water supplies and facilities, and the farms, ranches, and their products reliant on clean water sourced from wells, canals, and rivers for irrigation.

* Prolongs the uncertainty and distrust endured by Idaho citizens concerned about the financial conditions, bankruptcies, changing names, close relationships, failed communications, and questionable accountability of SROG and its numerous oil and gas company affiliates, and raises doubts about the ongoing rearrangements of compromised well locations, spacing units, integration orders, and forced leases, as lessors seek outcomes of class action lawsuits in Idaho and other states, alleging theft of their royalties by SROG and affiliated companies.

* Supports fossil fuel industry profiteering on access to private resources, against the will of Idahoans, and facilitates drilling and injection of hazardous chemicals through aquifers and in close proximity to waterways, homes, schools, farms, and businesses.

Deny Miller 1-15 Drilling Application

As the Idaho citizens who employ IDL and IOGCC, Wild Idaho Rising Tide expects state agency staff to uphold the well-being of Idaho waters, lands, wildlife, residents, and resources, over the profit-driven motives of private industry and the state's conflicting interests in revenues from reckless corporate pursuits reliant on IDL/IOGCC approval, like Snake River Oil and Gas' Miller 1-15 well drilling application. The plans and practices outlined in this proposal 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, regional presentations and demonstrations, to relentlessly thwart and halt this and further industrial invasions, especially in reaction to obviously dangerous drilling near hundreds of homes and businesses and essential water courses and public assets.

In accordance with the current Rules Governing Conservation of Oil and Natural Gas in the State of Idaho, and considering the inadequacies of SROG's application for Miller 1-15 methane well drilling and the aforementioned and other possible, significant impacts on fresh water supplies, natural resources, public and private infrastructure, and associated health, social, and economic conditions, we strongly request that IOGCC and IDL responsibly address the concerns and issues raised in these WIRT comments. For the public record, Wild Idaho Rising Tide asks that IDL and IOGCC reject or at least require revision and extended public review of this Miller 1-15 well drilling application, to ensure the best stewardship of Idaho's priceless and irreplaceable, public and private resources, which mismanagement could significantly alter and jeopardize.

WIRT recommends that the Idaho Department of Lands and Idaho Oil and Gas Conservation Commission require additional impact evaluations through a revised, SROG, Miller 1-15 well drilling application and spacing and integration orders explicitly connecting the Fallon 1-10 and Miller 1-15 wells, all responsive to public comment and hearing input. We also demand state denial of a permit for the Miller 1-15 well drilling application, along with the Miller 1-15 well spacing unit and integration order, for the previously stated and other commenters' reasons. During this decisive, project review phase, we ask that IOGCC and IDL consider and act in accordance with our and our colleagues' letters of objection that substantively address the deficiencies of SROG documents and processes, as we offer the counterbalance of regional insights so crucial to government and community protection of watersheds essential to lives and livelihoods. Thank you for accepting our comments on the Miller 1-15 well drilling application, intended both to improve SROG applications and to advocate for justifiably anticipated state of Idaho rejection of this SROG scheme to further inflict risks on Idahoans, while reaping the benefits of southwest Idaho oil and gas exploitation.

With great concern for our fellow citizens and shared natural resources in Idaho, WIRT appreciates your consideration of these comments and your responses and actions in accordance with them,

/s/ Helen Yost, MSEE
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[1] *Application for Permit to Drill Miller 1-15*, April 3, 2026 Snake River Oil and Gas/Idaho Oil and Gas Conservation Commission

https://ogcc.idaho.gov/wp-content/uploads/2026.03.31_SROG_Miller1-15_APD_no35_FINAL_Redacted.pdf

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<https://ogcc.idaho.gov/well-permit-applications>

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