



The Idaho Organization of Resource Councils

910 Main Street, Suite #244, Boise, ID 83702

Phone: 208.991.4451

Email: admin@IORCinfo.org

Website: www.IORCinfo.org

July 19, 2016

Mike Murphy, Bureau Chief
Endowment Leasing
Idaho Department of Lands
300 N. 6th Street, Suite 103
Boise, ID 83702-0050

Dear Mr. Murphy:

Thank you for the opportunity to participate in the negotiated rulemaking for IDAPA 20.03.16 Rules Governing Oil and Gas Leasing on Idaho State Lands, Docket No. 20-0316-1601. We look forward to working with the Idaho Department of Lands to improve protections for Idaho's people, air, land, and water.

The Idaho Organization of Resource Councils (IORC) is a 501(c)(3) tax exempt nonprofit organization based in Boise, Idaho. IORC has two local chapters representing members in Washington, Payette, and Bannock Counties. Its mission is to protect Idaho's way of life by empowering citizens to improve the economic well-being of their local communities by preserving family farms and ranches; supporting local, sustainable agriculture; developing small businesses and clean energy; and being responsible stewards of Idaho's water, land, air, and natural resources.

Please accept the following comments regarding IDAPA 20.03.16, Docket No. 20-0316-1601:

1. Create consistency with IDAPA 20.07.02

a. Review 20.03.16 for consistency with 20.07.02. Discrepancies were noted in the following sections, but this list is not meant to be exhaustive:

i. 022.02.e

ii. 050.04

1. During rulemaking for 20.07.02, IORC suggested increasing the setback distance to 500 feet. The current 300 foot setback is inadequate to protect people living near oil and gas. Placing oil and gas infrastructure close to people's homes and workplaces can negatively impact their health, property value, and quality of life.

2. Use term "occupied structure" in place of "residence" or "occupied residence." Addition of language to ensure protection of fresh water sources, and homes near tank batteries, processing facilities, and other oil and gas infrastructure.

iii. 050.07

iv. 050.08

Comments re: IDAPA 20.03.16 Rules Governing Oil and Gas Leasing in the State of Idaho, Docket No. 20-0136-1601



The Idaho Organization of Resource Councils

910 Main Street, Suite #244, Boise, ID 83702

Phone: 208.991.4451

Email: admin@IORCinfo.org

Website: www.IORCinfo.org

- v. 055.08
- vi. 070.02.e
- vii. 085

- **Calculate royalties based on actual amount produced versus sold at market, section 045.**

Thank you again for the opportunity to provide feedback during this rulemaking. If you have any questions please feel free to contact me at 208-991-4451.

Sincerely,
Doug Paddock
Field Organizer, IORC