

**From:** [David Heinz](#)  
**To:** [Oil and Gas Conservation Rulemaking](#); [James Thum](#); [Kourtney Romine](#)  
**Subject:** 20.07.02 Negotited Rulemaking  
**Date:** Friday, May 27, 2016 7:52:48 AM  
**Attachments:** [Scan - IDL &OGC Negotiated Rulemaking Letter 5-27-2106.pdf](#)

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See attached – comments from Trendwell West that we would like submitted to the IDL and Commission at the May 31<sup>st</sup> meeting.

Thank you

May 27, 2016

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Idaho Oil and Gas Conservation Commission  
Resource Protection & Assistance Bureau  
300 N 6<sup>th</sup> Street, Suite 103  
Boise, ID 83720

RE: 20.07.02 Rules Governing Conservation of Oil and Natural Gas in the State of Idaho – Negotiated Rulemaking

Dear Chairman Beck and Commissioners:

Trendwell West and its partners have been involved in Idaho with the leasing of thousands of acres of lands and also with exploration, drilling and completion operations. While the initial results of our drilling activities were disappointing it has not dissuaded us from continuing our exploration efforts in Idaho.

Trendwell is submitting this letter to express its support of the Department and Commission in their efforts to update IDAPA 20.07.02 through the negotiated rule process. We have reviewed the May 12<sup>th</sup> 2016 draft of proposed changes, clarifications, etc. that is posted on the IDL website. While we are in agreement with most, if not all of the proposed language, we are still concerned with how the future statute will deal with the confidentiality of information. Trendwell and others have expressed our position on this issue of well data confidentiality for several years now. While some progress was made during the last rule making in 2014 and approved by the Legislature in 2015, with regards to well logs and production data the effort was incomplete. We would like to see clear and definitive language in the new rules that would include and require the timely filing of **all** data related to the drilling and well completion operations as currently outlined in the rules and regulations and that such data cannot be held confidential for a period longer than six months to one year. These reporting and confidentially timeframes are common in other oil and gas producing states.

Any timeframes longer then these we deem to be excessive and not in the best interest of the State of Idaho and its citizens.

Thank you for the opportunity to comment on this important issue to the Idaho oil and gas industry and we look forward to working with you in the future.

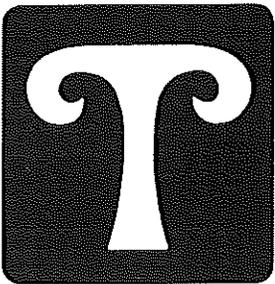
Sincerely



David R Heinz

President Trendwell West

TRENDWELL  
WEST INC.



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FOR YOU