

From: [Mary Susan Roach](#)
To: [Oil and Gas Conservation Rulemaking](#)
Subject: Comments on IDAPA 20.07.02
Date: Monday, June 13, 2016 4:04:41 PM
Attachments: [Eric Wilson.docx](#)

Here you go Eric. See you on Wednesday!

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Mary Sue Roach
339 Airport Rd.
Weiser, ID 83672

People will forget what you said, people will forget what you did, but people will never forget how you made them feel - Maya Angelou

Eric Wilson

Idaho Department of Lands

June 13, 2016

Dear Mr. Wilson,

I have a few comments to share regarding the negotiated rulemaking I have had the opportunity to participate in once again this summer.

DEFINITIONS:

I have researched Wyoming's rule and found a definition of "occupied structure" that states an occupied structure shall mean a building that was specifically constructed and approved for human occupancy such as a residence, school, office or other place of work, or a hospital. Occupied structure shall not mean outbuildings such as but not limited to sheds, barns or garages.

North Dakota occupied residence states the residence must be lived in by a person at least 6 months of the calendar year.

SURFACE OWNER PROTECTIONS 110

110.04 Surface use bond: Increase the minimum surface use bond to \$10,000 per well site as is done in Wyoming. The current bond of \$5,000 is not sufficient protection for surface use owners and needs to be strengthened. The surface owners have the least amount of protection but may be the most vulnerable to potential problems with land reclamation, lost income, etc.

PERMIT TO DRILL, DEEPEN OR RE-ENTER

200.04 Location of wells: No oil or gas wells may be constructed within **500 feet** of an existing occupied structure. This is consistent with changes in setbacks around the country. Wyoming increased their setback to 500 feet on 4/14/15. This same setback should also be the minimum for tank battery placement and gas processing facilities.

Thank you for the opportunity to submit these change requests. I feel very strongly that these changes will not only allow the oil and gas industry to operate and extract the natural gas and associated components, allow the State of Idaho to fulfill its mandates of conservation of our natural resources etc., but the proposed changes will afford the citizens of Idaho as much protection as possible to their property and surrounding environment while those that chose to lease their minerals can enjoy the fair financial gain they anticipate.

Mary Sue Roach

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