

From: [Brent Mathieu](#)
To: [Oil and Gas Conservation Rulemaking](#)
Subject: Draft rules 20.07.02 Oil and gas rules
Date: Thursday, October 06, 2016 05:28:26 PM

Dear people,

Regarding draft of rules at:

<https://www.idl.idaho.gov/rulemaking/20.07.02/Draft-Text/072616-draft-text.pdf>

Specifically, #30 - definition of Hydraulic Fracturing as:

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Hydraulic

Fracturing

, or Fracing

. A method of stimulating or increasing the recovery of hydrocarbons by perforating the production

casing and injecting fluids or gels

with proppant

into the potential target

reservoir

at pressures greater than the existing fracture gradient in the target reservoir.

I have not read the entire rule draft. A concern to consider is a minimum assurance of quality of any injected fluids or gels with proppant for Fracking. For the sake of water quality, of aquifers and surface water, it would be beneficial for each load of injected fluids or gel, have an adequate sample taken and stored for testing for pollutants for a period of time sufficient to allow any question of source of pollution from a well to be examined. Alternatively, random screening tests of injected fluids would help motivate supplier contractors to take minimum precautions to avoid pollutants.

Specifically, to prevent pollution of fresh water in aquifers and surface water, injected water based fluids ideally might be screened for industrial pollutants, such as benzene for example.

Incentives to discourage the use of industrial contaminants in injected fluids is recommended for the sake of environmental safety of all concerned.

In addition, I recommend that rules revise set back requirements to protect surface owner property rights as well as their personal safety and enjoyment of their land.

Thank you for any consideration.

Be well,

Dr Brent Mathieu

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