

From: [Idaho Carneys](#)
To: [Oil and Gas Conservation Rulemaking](#)
Subject: Administrative Rule Making Oil & Gas Rules
Date: Tuesday, October 25, 2016 04:56:04 PM

In regards to public input on rule making, I want to be on record and have grave concerns regarding the following points:

- Section 110 (P551). Surface Owner Protections - Surface Use Bond should be a minimum of \$5 Million as I believe the cost of these bonds is not significantly more than the minimum bond requirements. We **must** protect surface property owners and their property.
- Section 130. Integration (P 554)- Considering homeowner mortgages are put in jeopardy by any minerals production, No person nor their property should be force pooled into production against their will. Homeowner insurance policies explicitly do not cover damages due to extraction and Insurance Companies may cancel policies.
- Section 211. Hydraulic Fracturing (P562) subsection .02 - regarding volatile organic compounds. The ingredients used must be made public. Despite claims of the formulas being proprietary, this information should be on file so as to provide a pathway to clean up following use of VOC. These are volatile and we should demand transparency.
- Section 310. General Drilling Rules (P569) - please require all steel used in drilling and boring to be American made steel and disallow Chinese steel that may lead to failures due to insufficient process inspection. Failures could increase groundwater contamination. Requiring American steel is at least an effort to limit this potential. Surface casing should extend well below the lowest level of any freshwater reservoir below ground by at least 200 feet.
- Section 410. - Meters (P577). We must have frequent calibration. There is no reason to not have calibration take place monthly. And the calibration should be monitored by Idaho Department of Lands to provide complete accountability to our State Government for allowing this practice to take place in Idaho.

We all must be accountable for our actions as they have far reaching implications and I send you my comments with respect and trust you will respect the comments of your citizens.

Regards,
Phil Carney
1887 N. Groveland Place
Eagle, ID
83616