

From: director@fracdallas.org
To: [Oil and Gas Conservation Rulemaking](#)
Cc: lwadsen@cableone.net
Subject: IDL regarding Proposed Rules for Oil and Gas Conservation, Docket No. 20-0702-1601
Date: Tuesday, October 25, 2016 08:30:50 PM

Dear Mr. Wilson,

This e-mail relates to Section 211 - Hydraulic Fracturing, as follows:

Section 211. – Hydraulic Fracturing

Section 211.C. – “A detailed description of the proposed well stimulation design that shall include:

Section 211.C.iii. – “The estimated or calculated fracture height in both the horizontal and vertical directions.

Estimating or calculating the fracture height in any direction is a scientific impossibility. Such estimates would have to know the location, size and condition of existing faults, which is not even remotely possible to know. It would also require knowing all rock and soil conditions that control the length, width, height and direction of fractures, which will ALWAYS follow the path of least resistance. Beyond that, how would such estimates or calculation EVER be checked, and by whom?

This section attempts to require the scientifically impossible and should be clarified for scientific accuracy, or else removed entirely.

When a company tells you they are not going to frac wells you should take that with a grain of salt. When they tell you they cannot frac sandstone they are deceiving you. Geologists and engineers who have worked similar plays in Wyoming and Utah have clearly stated that the same formations there are here in Idaho, and that without frac'ing there is no hope of successful, profitable production, which is precisely why Alta Mesa has not produced enough minerals to pay the state the expected and anticipated severance taxes and royalties that were stated when AMI was trying to get permission to explore here.

The rules on hydraulic fracturing need to be comprehensive and adequate to protect the public and the private or state-owned minerals. Instead of the proposed rules IDL needs to consider the rules in place in mature oil and gas producing states and the various cities and counties that have enacted protective laws and ordinances that allow production, but only when done in accordance with regulations, rules and laws that protect citizens, their property values and their environment. The proposed rules do not protect any entity other than the producer at the expense of the State of Idaho and its taxpaying citizens.

Please make sure this e-mailed information is included in the official record of public documents submitted to IDL regarding Proposed Rules for Oil and Gas Conservation, Docket No. 20-0702-1601, as required by federal and state laws.

Most sincerely,

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"We only have one environment. When we destroy it we will become as extinct as the dinosaurs!"